

EXHIBIT 5

DECLARATION OF JENIFER C. SNOW

I, Jenifer C. Snow, declares as follows:

1. I am one of the Counsel for the Plaintiffs in this consolidated action and am submitting this declaration in connection with the Plaintiffs' Motion for Attorneys' Fees and am including my time records attached to this declaration.

2. I am over the age of eighteen (18) and have practiced law for nearly eight (8) years. In February 2021, I joined the Law Offices of Joan M. Swartz as a litigation attorney, where my practice is focused on representing and fighting for people who were injured through no fault of their own, including victims of discrimination, sexual harassment, wrongful termination and other employment-related legal issues. Prior to joining this firm, and from 2016 to 2021, I was an attorney at Kamykowski, Gavin & Smith, P.C.¹ ("Kamykowski"), where I handled primarily cases alleging personal injury, medical negligence, and wrongful death. Between 2018 and the present, I have been co-counsel with Susan McGraugh, John Ammann, and Brendan Roediger representing plaintiffs in several civil rights actions, including the cases filed by Karen Keil, Ashley Zieser, Lynsey Betz, and Jane Doe ("these cases").

3. I am a 2014 graduate of St. Louis University School of Law. I am a member of the following bars: State of Missouri, State of Illinois, United States District Court for the Eastern District of Missouri, United States District Court for the Western District of Missouri, United States District Court for the District of Kansas, United States District Court for the Southern District of Illinois and the U.S. Court of Appeals, Eighth Circuit.

4. These cases involved several years of both investigation and litigation. These cases also involved significant litigation expenses including major expenses for experts and depositions.

¹ Kamykowski, Gavin & Smith, P.C. rebranded to Kamykowski, Gavin & Taylor, P.C. in 2021 after I left. It has since rebranded again to Kamykowski & Taylor, P.C.

The documents produced by Defendant, and the DOC in response to subpoenas served, exceeded 40,000 (unsearchable) pages. In addition, these cases were fought hard and defended thoroughly. The Attorney General's office devoted excellent attorneys and unlimited amounts of hours in opposing these lawsuits. Multiple attorneys from the Office of the Attorney General have been involved in these cases over the years.

5. Between 2018 and 2021, while employed by Kamykowski, I was supervised by, and utilized the services of Ryan J. Gavin, one of the partners at the firm at the time. Mr. Gavin is a 1999 graduate of St. Louis University School of Law and has more than twenty-two (22) years of civil litigation and trial practice handling primarily cases alleging personal injury and wrongful death. He has tried more than thirty (30) cases to verdict in state and federal courts. Mr. Gavin's knowledge of the substantive law, procedural rules, and trial practice provided value to the team in preparing the Plaintiffs' cases for trial.

6. During the course of the litigation of these cases, I also utilized the services of several paralegals – both at Kamykowski and at the Law Offices of Joan M. Swartz. At Kamykowski, the paralegals who assisted me and the team in these cases include Kelly Ruff (KAR), Erica Roth (ENR) and Diane Ruck (DR). At the Law Offices of Joan M. Swartz, paralegal Joan (Jodi) Carpenter assisted our workup of these cases. Ms. Ruff, Ms. Roth, Ms. Ruck and Ms. Carpenter hold degrees in paralegal studies. At the time they performed work on these cases, Ms. Ruff had nearly fourteen (14) years of experience as a paralegal, Ms. Roth had seven (7) years of experience as a paralegal, Ms. Ruck was a new paralegal, and Ms. Carpenter had more than forty-five (45) years of experience as a paralegal.

7. The hourly rate charged by me is \$375.00 per hour; the hourly rate charged by Partner Ryan J. Gavin is \$425.00 per hour; and the hourly rate charged by paralegals Ms. Ruff,

Ms. Roth, Ms. Ruck and Ms. Carpenter is \$150.00 per hour. These rates are reasonable and in accordance with the prevailing market rates in this area.

8. According to the most recent Missouri Bar Economic Survey for 2021, over 34% of St. Louis Missouri attorneys' rates exceed \$300 and 21.5% of the same attorneys' rates exceed \$400 per hour. For paralegal services, 54% of Missouri paralegal services are billed at rates exceeding \$100.00 per hour.² In a comparison of experience levels with counsel who have disclosed billing rates at \$400 or higher, all counsel on these cases have the requisite experience level and the 2021 Economic Survey demonstrates the requested fees are reasonable and comparable to fees charged by the attorneys' peers.

9. The hourly rates for the attorneys in these cases, and the number of hours expended are fair and reasonable considering the result achieved, the expertise needed in working up Section 1983 actions, the vigorous defense by the Attorney General, the considerable number of documents which had to be reviewed and the number of witnesses we needed to depose.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 11th day of May, 2022, in St. Louis, Missouri.


Jennifer C. Snow

² Found at: <https://connect.mobar.org/viewdocument/2021-missouri-bar-economic-survey>

Kamykowski & Taylor, P.C.

222 S. Central Ave., Suite 1100

Clayton, Missouri 63105

Phone: 314.665.3280

Betz v. Bearden
For Services rendered between
June 5, 2018 – January 20, 2021

Invoice Date: May 10, 2022

Item	Date	Description	hrs.	Rate	Total	Billed By
Review/analyze	12/2/2019	Review Amended Scheduling Order.	0.1	\$150.00	\$15.00	ENR
TOTAL			0.1		\$15.00	ENR
Communicate (other outside counsel)	1/20/2021	Correspondences with all counsel regarding depositions of Leslie Carsey, Aaron York and Carrie Pfeifer.	0.2	\$375.00	\$75.00	JCS
Review/analyze	1/5/2021	Receive and review Order establishing new discovery and dispositive motion deadlines.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	12/31/2020	Correspondences with co-counsel regarding Motion to Continue Scheduling Deadline.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/31/2020	Correspondences with all counsel regarding discovery deadlines, specifically depositions and whereabouts of same.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/29/2020	Correspondences with all counsel regarding Court Order denying continuance of deadlines, generally, and plan for discovery, specifically, depositions moving forward including taking them virtually and deadlines for same.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/29/2020	Correspondences with co-counsel regarding plan for depositions, who to produce, who to request, how to produce/take them (virtually v. in person) and timeframe of same.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Draft/revise	12/21/2020	Continue to prepare Joint Motion to Continue Generally the Discovery Deadline, Dispositive Motion Deadline, and Daubert Motion Deadline	0.2	\$375.00	\$75.00	JCS
Communicate (other external)	9/9/2020	Continue to prepare email to defense counsel regarding party and fact witness depositions.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	9/4/2020	Telephone conference with all co-counsel regarding case status.	0.2	\$375.00	\$75.00	JCS
Communicate (other external)	9/2/2020	Correspondence with co-counsel to schedule conference call.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	8/26/2020	Correspondence with co-counsel regarding Plaintiff's initial discovery to serve on Defendants.	0.1	\$375.00	\$37.50	JCS
Draft/revise	8/25/2020	Continue to prepare discovery directed to Defendant Bearden.	0.2	\$375.00	\$75.00	JCS
Communicate (other external)	7/16/2020	Receive and review correspondence from M. Pennycuff regarding phone records to be produced.	0.1	\$375.00	\$37.50	JCS
Review/analyze	6/19/2020	Receive and review docket entry entering Amended Scheduling Order and calendar dates as-needed.	0.2	\$375.00	\$75.00	JCS
Communicate (other external)	6/15/2020	Correspondence with Ms. McIlvaine, Judge Phillip's deputy, to send her copy of Second Amended Scheduling Order for entry pursuant to docket entry.	0.1	\$375.00	\$37.50	JCS
Draft/revise	6/11/2020	Prepare Motion for Entry of Joint Second Amended Scheduling Order in Consolidated Cases	0.3	\$375.00	\$112.50	JCS
Draft/revise	6/11/2020	Finalize Joint Second Amended Scheduling Order in Consolidated Cases	0.2	\$375.00	\$75.00	JCS
Draft/revise	6/1/2020	Continue to prepare second amended joint scheduling order.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	6/1/2020	Continued correspondence with Defense counsel regarding second amended joint scheduling order.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Draft/revise	5/29/2020	Draft second amended scheduling order given COVID limitations and delays.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	5/26/2020	Correspondence to Defense Counsel regarding status of case, need for amended Scheduling Order, Expert discovery and party discovery.	0.2	\$375.00	\$75.00	JCS
Review/analyze	5/19/2020	Review Interrogatories directed to Defendant Bearden drafted by J. Ammann; Evaluate how to serve in all cases and suggest additional discovery to serve; Correspondence with co-counsel regarding same.	0.3	\$375.00	\$112.50	JCS
Communicate (other external)	5/15/2020	Correspondence with co-counsel regarding Scheduling Order and need of new timeline of case.	0.2	\$375.00	\$75.00	JCS
Review/analyze	5/1/2020	Review, revise and continue to update information regarding fact witnesses and their whereabouts for purposes of responding to N. Taulbee's request for depositions of same.	0.3	\$375.00	\$112.50	JCS
Review/analyze	5/1/2020	Continue to review files, specifically pleadings, Rule 26 disclosures to identify witnesses for all parties, and documents produced by DOC to continue to analyze same.	0.4	\$375.00	\$150.00	JCS
Communicate (other external)	4/27/2020	Correspondence with C. Atwell regarding mediation invoice received to inquire about same as I thought it had been paid by co-counsel J. Ammann.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	4/27/2020	Correspondence with co-counsel regarding fact witness discovery.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	4/22/2020	Correspondence with co-counsel, J. Ammann regarding discovery to serve on Defendant Bearden.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	4/7/2020	Correspondences with all counsel regarding witness depositions.	0.2	\$375.00	\$75.00	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other outside counsel)	3/2/2020	Correspondence with all counsel regarding discovery, specifically Plaintiff's objections, answers and responses and regarding requested DOC depositions.	0.1	\$375.00	\$37.50	JCS
Research	2/17/2020	Research lay witness contact information.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	2/12/2020	Conference call with S. McGraugh and her clinic students regarding offender-witness project, specifically regarding our needs of information, i.e., if they are incarcerated or not currently and what their contact information is if they have been released.	0.2	\$375.00	\$75.00	JCS
Appear for/attend	2/6/2020	Attend lunch meeting with co-counsel and Dora Schriro.	0.7	\$375.00	\$262.50	JCS
Draft/revise	2/5/2020	Prepare discovery scheduling order and correspondences with co-counsel regarding filing same.	0.1	\$375.00	\$37.50	JCS
Review/analyze	2/5/2020	Review file and notes to continue to update and create deposition list and send/receive correspondences between/among co-counsel regarding strategy for same.	0.3	\$375.00	\$112.50	JCS
Review/analyze	1/31/2020	Receive and review HIPAA release from Defendant Bearden for execution by Plaintiff.	0.1	\$375.00	\$37.50	JCS
Review/analyze	1/30/2020	Receive and review Defendant Bearden's First Interrogatories and First Request for Production directed to Plaintiff.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	1/27/2020	Exchange email correspondence with all counsel regarding status reports.	0.1	\$375.00	\$37.50	JCS
Review/analyze	1/24/2020	Receive and review Orders consolidating cases and reassigning case to Judge Phillips.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (in firm)	1/20/2020	Correspondence with co-counsel regarding upcoming deadlines and no ruling on pending motion to consolidate.	0.1	\$375.00	\$37.50	JCS
Review/analyze	1/10/2020	Receive and review Department of Corrections response to subpoena.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	1/8/2020	Correspondence with all counsel regarding consolidating case.	0.1	\$375.00	\$37.50	JCS
Appear for/attend	1/7/2020	Attend meeting with all co-counsel regarding case status and strategy.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	1/6/2020	Correspondences among Plaintiff's counsel regarding Motion to Consolidate.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	1/6/2020	Correspondences among Plaintiff's counsel regarding fees and expenses incurred to date and anticipated to be incurred in the future and procedure in place for same.	0.1	\$375.00	\$37.50	JCS
Document Production/Creation/Preparation	12/13/2019	Receive, review and process to file final (produced) expert reports.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	12/12/2019	Receive and review Judge Atwell's post-mediation report sent to Jill Morris.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/12/2019	Correspondence with all counsel regarding consolidating pending cases for purposes of discovery.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/10/2019	Correspondence with all counsel regarding consolidating pending cases for discovery.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	12/9/2019	Correspondence with K. Batcheller, Judge Atwell's assistant, regarding post-mediation status report; Correspondence with all counsel regarding same.	0.2	\$375.00	\$75.00	JCS
Review/analyze	12/6/2019	Review expert report from Dora.	0.2	\$375.00	\$75.00	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other outside counsel)	12/3/2019	Review materials and attend conference call with all co-counsel to discuss strategy and to-dos.	0.4	\$375.00	\$150.00	JCS
Appear for/attend	11/26/2019	Attend Mediation with Judge Atwell.	4	\$375.00	\$1,500.00	JCS
Communicate (other outside counsel)	11/25/2019	Receive and review email correspondence from Mr. Taulbee regarding protective order.	0.1	\$375.00	\$37.50	JCS
Review/analyze	11/25/2019	Receive and review Amended Scheduling Order.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	11/22/2019	Correspondence with all counsel regarding mediation specifics such as attendees, position regarding opening statements and request to not have any interaction between Plaintiff and Defendants.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	11/18/2019	Correspondence with team regarding mediation statement and travel plans to attend November 26th mediation.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	11/7/2019	Correspondence with J. Ammann to prepare language for Subpoena on Corizon.	0.1	\$375.00	\$37.50	JCS
Appear for/attend	11/4/2019	Attend Pre-Mediation Call with Judge Atwell.	0.3	\$375.00	\$112.50	JCS
Time	10/9/2019	Continue to prepare subpoena to DOC.	0.1	\$375.00	\$37.50	JCS
Time	10/8/2019	Receive and review correspondence from mediator regarding mediation to-dos.	0.2	\$375.00	\$75.00	JCS
Time	9/30/2019	Evaluate need to amend pleadings and/or add additional parties.	0.2	\$375.00	\$75.00	JCS
Time	9/18/2019	Receive and review Mediation and Assessment Program Reminder that the post-mediation status report is due within 10 calendar days after the mediation.	0.1	\$375.00	\$37.50	JCS
Time	9/17/2019	Finalize and file updated designation of mediator form.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	9/12/2019	Prepare Joint Designation of Mediator forms and circulate to N. Taulbee, counsel for E. Bearden, to get his approval before filing by September 13, 2019 deadline.	0.3	\$375.00	\$112.50	JCS
Time	9/5/2019	Correspondences with all counsel to schedule mediation.	0.2	\$375.00	\$75.00	JCS
Time	9/3/2019	Review subpoena for DOC and send correspondence to team regarding same and to discuss mediation and consolidating discovery.	0.2	\$375.00	\$75.00	JCS
Time	8/28/2019	Meet with team to discuss case to-dos.	0.3	\$375.00	\$112.50	JCS
Time	8/23/2019	Correspondence with all attorneys regarding mediation and mediator; Correspondence with Plaintiff's attorneys regarding mediation coverage (.1); Continue to prepare initial disclosures (.1).	0.2	\$375.00	\$75.00	JCS
Time	8/16/2019	Receive and review correspondence from Jill Morris, MAP direction, regarding mediator designation and mediation deadline and calendar same.	0.2	\$375.00	\$75.00	JCS
Time	7/29/2019	Continue to prepare scheduling order and send/receive several correspondences among counsel of record regarding same.	0.3	\$375.00	\$112.50	JCS
Time	6/26/2019	Continued correspondences with counsel of record regarding lifting the stay.	0.1	\$375.00	\$37.50	JCS
Time	6/24/2019	Review Proposed Motion to Lift Stay; Correspondence with Plaintiff's team regarding same.	0.1	\$375.00	\$37.50	JCS
Time	4/29/2019	Receive and Review Order Granting Joint Motion to Extend Stay until July 1, 2019.	0.1	\$375.00	\$37.50	JCS
Time	4/26/2019	Receive and review filed Joint Motion to Extend Stay.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	4/25/2019	Correspondences with all counsel of record regarding extension of stay of proceedings.	0.2	\$375.00	\$75.00	JCS
Time	4/24/2019	Correspondence with Plaintiffs' counsel regarding continued stay; Review and review Joint Motion for Continued Stay.	0.1	\$375.00	\$37.50	JCS
Time	2/26/2019	Receive and review Court Order staying case; Correspondence with J. Morris to inform her the case is stayed until May 1, 2019, including all mediation deadlines/events.	0.3	\$375.00	\$112.50	JCS
Time	2/22/2019	Receive and review notice of filing from Court regarding mediation deadlines approaching.	0.1	\$375.00	\$37.50	JCS
Time	2/14/2019	Receive and review Rule 16 Order from Court.	0.4	\$375.00	\$150.00	JCS
Time	2/8/2019	Prepare Joint Motion for Stay.	0.3	\$375.00	\$112.50	JCS
Time	12/10/2018	Telephone conference call with J. Ammann, B. Rodieger, and S. McGraugh regarding cases, including to-dos and fees.	0.5	\$375.00	\$187.50	JCS
Time	6/5/2018	Review and revise complaint; Correspondence with J. Ammann regarding allegations and case moving forward; Review release; Review news coverage on Betz' story already.	0.9	\$375.00	\$337.50	JCS
TOTAL			19.4		\$7,275.00	JCS
Time	7/31/2019	Review Scheduling Order.	0.1	\$150.00	\$15.00	KAR
TOTAL			0.1		\$15.00	KAR
Review/analyze	4/30/2020	Review pleadings and discovery in preparation for strategy conference with J. Snow.	0.7	\$425.00	\$297.50	RJG
Review/analyze	4/29/2020	Review and analyze additional document production by the Department of Corrections.	0.3	\$425.00	\$127.50	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Review/analyze	3/30/2020	Initial receipt and review of documents produced by Missouri Department of Corrections.	0.8	\$425.00	\$340.00	RJG
Appear for/attend	2/6/2020	Attend lunch meeting with co-counsel and Dora Schriro.	0.7	\$425.00	\$297.50	RJG
Communicate (other external)	1/27/2020	Exchange email correspondence with all counsel regarding status reports.	0.2	\$425.00	\$85.00	RJG
Review/analyze	1/24/2020	Receive and review order granting Motion to Consolidate.	0.1	\$425.00	\$42.50	RJG
Review/analyze	1/10/2020	Receive and review Department of Corrections response to subpoena.	0.2	\$425.00	\$85.00	RJG
Plan and prepare for	1/7/2020	Review file in preparation for conference call with all counsel.	0.2	\$425.00	\$85.00	RJG
Appear for/attend	1/7/2020	Attend meeting with all co-counsel regarding case status and strategy.	0.2	\$425.00	\$85.00	RJG
Communicate (other external)	1/5/2020	Receive and review email correspondence from Mr. Ammann regarding proposed fee agreements.	0.1	\$425.00	\$42.50	RJG
Review/analyze	12/12/2019	Review final drafts of expert reports.	0.4	\$425.00	\$170.00	RJG
Review/analyze	12/4/2019	Review and analyze draft report of Dora Schriro.	0.2	\$425.00	\$85.00	RJG
Review/analyze	11/27/2019	Review and analyze draft expert report.	0.2	\$425.00	\$85.00	RJG
Communicate (other external)	11/25/2019	Receive and review email correspondence from Mr. Taulbee regarding protective order.	0.1	\$425.00	\$42.50	RJG
Review/analyze	11/25/2019	Receive and review amended scheduling order.	0.1	\$425.00	\$42.50	RJG
Time	7/29/2019	Exchange email correspondence with all counsel regarding scheduling order.	0.2	\$425.00	\$85.00	RJG
Time	12/26/2018	Receive and review email correspondence from Ms. McGraugh regarding DOJ interviews.	0.1	\$425.00	\$42.50	RJG
Time	8/13/2018	Receive and review Answer of Edward Bearden.	0.2	\$425.00	\$85.00	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	7/17/2018	Telephone conference with Leslie Carsey regarding potential client interviews; Exchange email correspondence with John Amann and other counsel regarding same.	0.5	\$425.00	\$212.50	RJG
Time	6/14/2018	Review client fee agreement.	0.2	\$425.00	\$85.00	RJG
TOTAL			5.7		\$2,422.50	RJG
GRAND TOTAL			25.30		\$19,455.00	

Law Office of Joan M. Swartz
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 St. Louis, MO 63143
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 (314) 471-2032

Law Office of Joan M. Swartz

SLU Law Clinic Cases

Balance \$19,179.39
Invoice # 00695
Invoice Date May 10, 2022
Payment Terms
Due Date

Betz v. Bearden

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
02/03/2021	JCS	Draft Documents	Prepare Notice of Change of Address	\$375.00	0.2	\$75.00
02/03/2021	JCS	Correspondence	Various correspondences with all counsel regarding upcoming party and witness depositions.	\$375.00	0.2	\$75.00
02/08/2021	JCS	Correspondence	Telephone correspondence with co-counsel to discuss deposition testimony, upcoming depositions and case theories moving forward.	\$375.00	0.2	\$75.00
02/18/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding upcoming depositions.	\$375.00	0.1	\$37.50
02/25/2021	JCS	Confer with co-counsel	Telephone conference call with J. Ammann to catch up on depositions in all cases.	\$375.00	0.1	\$37.50
03/05/2021	JCS	Confer with opposing counsel	Continued correspondences with all counsel regarding depositions.	\$375.00	0.1	\$37.50
03/12/2021	JCS	Correspondence	Continued correspondences with all counsel regarding party depositions.	\$375.00	0.1	\$37.50
03/15/2021	JCS	Correspondence	Correspondences with team and with defense counsel regarding reopening settlement negotiations before 20+ more depositions and trial prep occurs; Correspondences with co-counsel regarding upcoming depositions and strategy for same.	\$375.00	0.5	\$187.50
03/15/2021	JCS	Draft Correspondence	Continue to prepare supplemental disclosures.	\$375.00	0.1	\$37.50
03/24/2021	JCS	Confer with co-counsel	Phone conference with J. Ammann and B. Roediger to discuss settlement, specifically demand amounts and strategy for making same.	\$375.00	0.2	\$75.00
03/28/2021	JCS	Correspondence	Make demand via email to defense counsel.	\$375.00	0.2	\$75.00
03/31/2021	JCS	Confer with co-counsel	Correspondence with co-counsel re: discussions with Defense Counsel relating to settlement.	\$375.00	0.1	\$37.50

04/01/2021	JCS	Confer with co-counsel	Continued correspondences with co-counsel regarding settlement negotiations and supplemental disclosures.	\$375.00	0.1	\$37.50
04/02/2021	JCS	Confer with opposing counsel	Correspondence with P. Brown and N. Taublee to schedule April 6th mediation.	\$375.00	0.1	\$37.50
04/02/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding mediation, specifically our position re: mediator, value of each case, and to-do's between now and mediation including mediation statement to prepare and calls to clients to make.	\$375.00	0.3	\$112.50
04/04/2021	JCS	Draft Documents	Continue to prepare Plaintiffs' Joint Mediation Statement; Correspondences with co-counsel regarding same.	\$375.00	0.2	\$75.00
04/05/2021	JCS	Confer with opposing counsel	Correspondences with opposing counsel regarding cancellation of mediation.	\$375.00	0.1	\$37.50
04/05/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding mediation statement and then cancellation of mediation.	\$375.00	0.1	\$37.50
04/05/2021	JCS	Draft Documents	Finalize and submit mediation statement.	\$375.00	0.1	\$37.50
04/06/2021	JCS	Confer with co-counsel	Correspondence with J. Ammann and B. Rodieger regarding to-do's following defense counsel's abrupt cancellation of mediation.	\$375.00	0.1	\$37.50
04/07/2021	JCS	Confer with opposing counsel	Correspondences with defense counsel regarding discovery, deposition scheduling, kicking trial settings and discovery cut-off dates	\$375.00	0.2	\$75.00
04/07/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding discovery, deposition scheduling, kicking trial settings and discovery cut-off dates, and testimony elicited and to be elicited.	\$375.00	0.2	\$75.00
04/13/2021	JCS	Review	Receive and review Court order extending discovery deadlines and revising scheduling orders in consolidated cases.	\$375.00	0.1	\$37.50
04/15/2021	JCS	Correspondence	Various correspondences with team re: party depositions.	\$375.00	0.1	\$37.50
04/16/2021	JCS	Correspondence	Correspondences with all counsel re: party depositions.	\$375.00	0.2	\$75.00
05/14/2021	JCS	Confer with co-counsel	Conference call with co-counsel to discuss defense strategy and to-do's.	\$375.00	0.1	\$37.50
06/11/2021	JCS	Correspondence	Correspondences with co-counsel to set up meeting to discuss cases.	\$375.00	0.1	\$37.50
06/15/2021	JCS	Conference	Meet with co-counsel and team to go over all cases, prepare to-dos and discuss strategy.	\$375.00	0.4	\$150.00
06/16/2021	JCS	Correspondence	Correspondence to all counsel of record canceling Briesacher's deposition.	\$375.00	0.1	\$37.50
07/08/2021	JCS	Correspondence	Correspondences with all counsel regarding call from Katie Moore from Kansas City Star and plan for media involvement moving forward.	\$375.00	0.1	\$37.50
07/13/2021	JCS	Correspondence	Correspondences with all counsel regarding upcoming depositions in consolidated cases.	\$375.00	0.1	\$37.50
07/14/2021	JCS	Correspondence	Telephone conference with team re: strategy of cases moving forward.	\$375.00	0.2	\$75.00
07/29/2021	JCS	Confer with co-counsel	Call w/ John Ammann re: strategy and to-dos with discovery deadline being tomorrow, July 30, 2021.	\$375.00	0.2	\$75.00
08/01/2021	JCS	Correspondence	Correspondence with co-counsel regarding Defendant Bearden's shifts and hours worked	\$375.00	0.1	\$37.50

08/06/2021	JCS	Review	Receive and review telephone logs from DOJ/DOC; Correspondence with J. Ammann, co-counsel, regarding same	\$375.00	0.2	\$75.00
08/13/2021	JCS	Review	Receive and initial review Defendants' Daubert Motions	\$375.00	0.2	\$75.00
08/20/2021	JCS	Correspondence	Telephone correspondence with Laurel Stevenson re: cases and MAP program and mediation v. informal resolution of each.	\$375.00	0.2	\$75.00
08/20/2021	JCS	Draft Documents	Prepare settlement correspondence to L. Stevenson and send her same, along with May 2021 settlement statement.	\$375.00	0.3	\$112.50
08/22/2021	JCS	Review	Review Defendants' Motions to Exclude Expert Opinions.	\$375.00	0.2	\$75.00
08/22/2021	JCS	Draft Documents	Begin to prepare Plaintiffs' Responses to Defendants' Motions to Exclude Expert Opinions.	\$375.00	0.4	\$150.00
08/26/2021	JCS	Correspondence	Telephone conference call with MAP Coordinator to discuss and schedule mediation	\$375.00	0.2	\$75.00
08/29/2021	JCS	Confer with co-counsel	Correspondence with co-counsel re; upcoming mediations and strategy for same.	\$375.00	0.1	\$37.50
08/30/2021	JCS	Draft Documents	Continue to prepare Responses in Opposition to Defendant(s)' Motion to Exclude Expert Opinions	\$375.00	0.4	\$150.00
08/30/2021	JCS	File	Finalize and file Plaintiff's Responses in Opposition to Defendant(s)' Motion to Exclude Expert Opinions	\$375.00	0.2	\$75.00
08/30/2021	JCS	Correspondence	Ongoing correspondences with co-counsel regarding responses to dispositive and daubert motions	\$375.00	0.2	\$75.00
09/03/2021	JCS	Correspondence	Correspondence with team re: upcoming deadlines and mediation.	\$375.00	0.2	\$75.00
09/07/2021	JCS	Attend Mediation	Attend Part I of mediation with all counsel and Laurel Stevenson	\$375.00	0.5	\$187.50
09/07/2021	JCS	Review	Review file and settlements and verdicts found to prepare for mediation with all counsel and Laurel Stevenson	\$375.00	0.2	\$75.00
09/09/2021	JCS	Correspondence	Correspondence with various attorneys re: "summary jury trial" to evaluate same	\$375.00	0.6	\$225.00
09/21/2021	JCS	Correspondence	Correspondences with team re: consolidation and trial settings	\$375.00	0.1	\$37.50
09/24/2021	JCS	Correspondence	Correspondences with team re: consolidation and review motion prepare to do same	\$375.00	0.1	\$37.50
09/29/2021	JCS	Review	Receive and review Court Order on experts.	\$375.00	0.1	\$37.50
10/11/2021	JCS	Revise documents	Redline motion and suggestions in support of motion to consolidate; correspondences with team re: same	\$375.00	0.3	\$112.50
10/21/2021	JCS	Review	Receive and review correspondence from Laurel Stevenson re: her efforts to get answer from AGs office on issue of consolidation	\$375.00	0.1	\$37.50
10/26/2021	JCS	Review	Receive and review defendant's opposition to consolidation	\$375.00	0.1	\$37.50
10/27/2021	JCS	Confer with co-counsel	Conference call regarding Motion to Consolidate, Defendant's Response and need for reply	\$375.00	0.1	\$37.50
11/17/2021	JCS	Review	Receive and review Orders from Judge Phillips re: consolidating cases and deadlines moving forward, including trial date and all pre-trial deadline.	\$375.00	0.2	\$75.00

11/17/2021	JCS	Confer with co-counsel	Confer with team re: consolidation, deadlines, and next steps.	\$375.00	0.2	\$75.00
11/22/2021	JCS	Correspondence	Attend Part I of mediation with all counsel and Laurel Stevenson	\$375.00	0.1	\$37.50
11/22/2021	JCS	Correspondence	Correspondences with co-counsel re: mediation in this matter.	\$375.00	0.2	\$75.00
11/23/2021	JCS	Confer with co-counsel	Confer with team re: mediation in consolidated cases per Court Order.	\$375.00	0.2	\$75.00
11/29/2021	JCS	Confer with co-counsel	Confer with team re: plan for this week, specifically mediation of consolidated cases Wednesday 12/1.	\$375.00	0.1	\$37.50
11/30/2021	JCS	Confer with co-counsel	Various correspondences with co-counsel regarding consolidated cases and mediation	\$375.00	0.2	\$75.00
12/01/2021	JCS	Attend Mediation	Attend Mediation in Consolidated Cases (per Court Order); Correspondence with team before and after same; Receive summary correspondence from Laurel Stevenson re: same.	\$375.00	0.8	\$300.00
12/02/2021	JCS	Confer with co-counsel	Ongoing correspondences with team following mediation and settlement numbers	\$375.00	0.1	\$37.50
12/03/2021	JCS	Confer with co-counsel	Correspondences with team regarding trial strategy and schedule.	\$375.00	0.3	\$112.50
12/08/2021	JCS	Draft Documents	Continue to prepare writ for T. Dean to appear at trial	\$375.00	0.2	\$75.00
12/13/2021	JCS	Draft Documents	Prepare writ for T. Dean to appeal at trial, file and serve same	\$375.00	0.2	\$75.00
12/22/2021	JCS	Confer with co-counsel	Team meeting with co-counsel re: pre-trial to-do's and trial strategy.	\$375.00	0.6	\$225.00
12/27/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
12/28/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
12/29/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
01/03/2022	JCS	Draft Documents	Continue to prepare and finalize Motions in Limine.	\$375.00	0.2	\$75.00
01/04/2022	JCS	Confer with co-counsel	Confer with co-counsel regarding pre-trial team meeting and pre-trial deadlines	\$375.00	0.2	\$75.00
01/04/2022	JCS	Review	Review request for writ filed by defendant; confer with team re: same	\$375.00	0.2	\$75.00
01/04/2022	JCS	Review and revise	Review and continue to prepare stipulations	\$375.00	0.2	\$75.00
01/06/2022	JCS	Confer with co-counsel	Confer with co-counsel regarding trial strategy and other pre-trial filings and to-do's	\$375.00	0.4	\$150.00
01/06/2022	JCS	Prepare for court hearing	Prepare trial binder	\$375.00	0.4	\$150.00
01/10/2022	JCS	Draft Documents	Review Defendant's Motions in Limine; Begin to draft response to Defendant's Motions in Limine; Correspondences with all counsel re: same; Continue to prepare witness list and trial brief.	\$375.00	0.4	\$150.00
01/11/2022	JCS	Draft Documents	Continue to prepare exhibit list, Rule 415 Notice and preliminary Voir Dire questions.	\$375.00	0.4	\$150.00
01/12/2022	JCS	Confer with co-counsel	Confer with co-counsel re: trial exhibits and trial to-dos; Continue to prepare for trial.	\$375.00	0.3	\$112.50
01/13/2022	JCS	Draft Documents	Confer with team; Continue to prepare witness list for trial.	\$375.00	0.3	\$112.50
01/13/2022	JCS	Review	Receive and review Defendant's witness list, exhibit list, and jury questions.	\$375.00	0.2	\$75.00

01/14/2022	JCS	Confer with co-counsel	Confer with team re: Defendant's witness list and our response to same.	\$375.00	0.2	\$75.00
01/14/2022	JCS	Draft Documents	Continue to prepare Response to Defendant's Motions in Limine	\$375.00	0.2	\$75.00
01/17/2022	JCS	Draft Documents	Continue to prepare: Plaintiffs' Response to Defendant's Motions in Limines; Plaintiffs' Motion to Strike Defendant's Experts and Exhibit List; Plaintiff's Jury Instructions; and Stipulations in preparation for consolidated trial.	\$375.00	0.5	\$187.50
01/17/2022	JCS	Research	Research issues in Defendant's Motion in Limine to prepare response to same.	\$375.00	0.2	\$75.00
01/18/2022	JCS	Draft Documents	Continue to prepare and finalize Plaintiffs' Response to Defendant's Motions in Limine	\$375.00	0.2	\$75.00
01/19/2022	JCS	Confer with co-counsel	Meeting with co-counsel re: pretrial and trial.	\$375.00	0.5	\$187.50
01/19/2022	JCS	Review	Begin to review cases cited throughout Motions in Limine to prepare for pretrial	\$375.00	0.3	\$112.50
01/20/2022	JCS	Prepare for court hearing	Prepare for pretrial, specifically arguments on Plaintiffs' and Defendant's Motions in Limine	\$375.00	1.0	\$375.00
01/21/2022	JCS	Attend court hearing	Attend pretrial in Kansas City; Travel to/from.	\$375.00	4.0	\$1,500.00
01/21/2022	JCS	Review	Receive and review Court's docket entries and Orders following pretrial.	\$375.00	0.1	\$37.50
01/21/2022	JCS	Draft Documents	Prepare Writ of Habeas Corpus Ad Testificandum for Plaintiff Lynnsey Betz.	\$375.00	0.5	\$187.50
01/24/2022	JCS	Review	Receive and review Court Order re: Plaintiffs' Motion to Exclude Testimony of Maya Gasas.	\$375.00	0.1	\$37.50
01/24/2022	JCS	Correspondence	Receive and review correspondence from Court re: trial being continued; initial correspondences with the court, opposing counsel and team re: new trial setting	\$375.00	0.2	\$75.00
01/26/2022	JCS	Correspondence	Ongoing correspondences with court, opposing counsel and team re: new trial setting	\$375.00	0.2	\$75.00
01/27/2022	JCS	Review	Receive and review new consolidated trial setting; notify clients, experts and current and prior team re: same.	\$375.00	0.3	\$112.50
03/24/2022	JCS	Correspondence	Correspondences with prison to set up pre-trial (consolidated cases) meeting w/ Dean	\$375.00	0.1	\$37.50
03/28/2022	JC	Draft/Revise	Prepare letter to Ms. Wright requesting in-person trial preparation meeting with J. Snow and Teri Dean.	\$150.00	0.1	\$15.00
03/28/2022	JC	Draft filings	Begin preparation of Plaintiffs' Request for Writ of Habeas Corpus Ad Testificandum related to Teri Dean.	\$150.00	0.1	\$15.00
03/28/2022	JCS	Correspondence	Correspondence with prison to schedule pre-trial meeting with T. Dean.	\$375.00	0.2	\$75.00
04/05/2022	JCS	Review and confer	Prepare and file writ for Dean; Correspondence with team re: outlines, topics, pre-trial meeting plans	\$375.00	0.3	\$112.50
04/06/2022	JCS	Conference	Attend pre-trial meeting with team; Confer with clerk and courtroom deputy to get details on voir dire seating chart, jury seating/rules, lunches, etc.; Correspondences with defense counsel re: exhibits for trial and access to same and rulings on motions in limine.	\$375.00	1.0	\$375.00

04/08/2022	JCS	Review	Review demonstrative chart circulated by J. Ammann and compare to Dean's housing assignments to illustrate when Bearden and Dean would have been in the same place at the same time; Correspondences with team re: demonstrative.	\$375.00	0.2	\$75.00
04/11/2022	JCS	Review	Review exhibits/link from defense counsel; review defense counsel's notes on MILs; prepare voir dire map; compile documents for voir dire; Ongoing correspondences with team re: pre-trial strategy, to-do's, etc.	\$375.00	0.4	\$150.00
04/11/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 1-7 to be used at trial.	\$150.00	0.1	\$15.00
04/12/2022	JCS	Review	Review EOA filed by Abbie Rothermich	\$375.00	0.1	\$37.50
04/13/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 8-10 and 22-23 to be used at trial.	\$150.00	0.1	\$15.00
04/14/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 24-33 to be used at trial.	\$150.00	0.1	\$15.00
04/15/2022	JCS	Correspondence	Correspondence with T. Dean re: pre-trial meeting and trial appearance and what to expect; Continued correspondence with Vandalia re: April 22nd visit with T. Dean to adjust time for same; Correspondence with team re: trial strategy issues.	\$375.00	0.5	\$187.50
04/15/2022	JCS	Review	Review defendants exhibits and discuss job charts with co-counsel J. Ammann.	\$375.00	0.3	\$112.50
04/19/2022	JCS	Correspondence	Correspondences with team re: ongoing trial prep and strategy.	\$375.00	0.2	\$75.00
04/19/2022	JCS	Review	Research and review Defense witness, D. Clay, for purposes of preparing her cross-examination	\$375.00	0.1	\$37.50
04/20/2022	JCS	Draft Documents	Prepare summary of Dean's case for use in opening; Begin to prepare direct examination of Dean for use at trial; Correspondences with team re: same; Continue to prepare and discuss demonstratives	\$375.00	1.5	\$562.50
04/21/2022	JCS	Conference	Pre-trial team meeting to discuss trial and further develop themes and strategy	\$375.00	0.5	\$187.50
04/22/2022	JCS	Meet with Client	Travel to/from Vandalia to meet with T. Dean to prep her for trial	\$375.00	2.0	\$750.00
04/23/2022	JCS	Transportation	Travel to Kansas City for trial.	\$375.00	1.0	\$375.00
04/24/2022	JCS	Confer with co-counsel	Ongoing discussions with co-counsel re: case strategy.	\$375.00	0.3	\$112.50
04/25/2022	JCS	Attend court hearing	Attend and partake in day one of trial, including voir dire, openings and start of plaintiffs' case in chief; Prepare for day two of trial.	\$375.00	3.4	\$1,275.00
04/26/2022	JCS	Attend court hearing	Attend and partake in day two of trial; Prepare expert for day three of trial.	\$375.00	3.5	\$1,312.50
04/27/2022	JCS	Attend court hearing	Attend and partake in day three of trial.	\$375.00	2.5	\$937.50
04/28/2022	JCS	Attend court hearing	Attend and partake in day four of trial.	\$375.00	2.0	\$750.00
04/29/2022	JCS	Attend court hearing	Return travel from trial back to St. Louis.	\$375.00	1.0	\$375.00
05/07/2022	JCS	Correspondence	Correspondences with my prior firm, Kamykowski Gavin and Smith, to obtain time and expense reports to include in Plaintiffs' Motion for Fees.	\$375.00	0.4	\$150.00

05/08/2022	JCS	Draft Documents	Continue to prepare Plaintiffs' Motion for Attorney Fees; Discuss declarations, other exhibits, etc., to attach to same.	\$375.00	0.3	\$112.50
05/09/2022	JCS	Draft Documents	Continue to prepare Motion for Attorney Fees; Correspondences with team re: same.	\$375.00	0.2	\$75.00
05/09/2022	JCS	Research	Research reasonable attorney rates to apply to hours in order to continue to prepare Motion for Attorney Fees; Correspondences with team re: same.	\$375.00	0.3	\$112.50
05/10/2022	JCS	Draft Documents	Continue to prepare declaration; Continue to prepare Motion for Attorney's Fees.	\$375.00	1.0	\$375.00
05/10/2022	JC	Draft filings	Prepare Declaration of Jenifer C. Snow to be filed with Plaintiffs' Motion for Attorneys' Fees; Continue preparation of exhibits to be filed with Plaintiffs' Motion for Attorneys' Fees.	\$150.00	1.5	\$225.00
Non-billable Time Entries:						
03/16/2021	JCS	Deposition	Appear for and attend deposition of Vevia Sturm	\$375.00	0.6	\$225.00
04/07/2021	JCS	Correspondence	Attend Defendant Bearden's Deposition.	\$375.00	0.4	\$150.00

Totals: **52.4 \$18,825.00**

Expenses

Date	EE	Activity	Description	Cost	Quantity	Line Total
04/22/2022	JC	Mileage	Travel to/from Vandalia, MO for trial preparation with inmate Teri Dean.	\$27.70	1.0	\$27.70
05/04/2022	JC	Reimbursable Expense	Jenifer hotel for trial 4.23.22 - 4.30.22 (split 4 ways).	\$305.64	1.0	\$305.64
05/04/2022	JC	Reimbursable Expense	Trial Expenses – Travel for trial (split 4 ways).	\$21.05	1.0	\$21.05

Expense Total: **\$354.39**

Notes:

JC Total: 2.0 hours; \$300.00
JCS Total: 50.4 hours; \$18,525.00

Time Entry Sub-Total:	\$18,825.00
Expense Sub-Total:	\$354.39
Sub-Total:	\$19,179.39
Total:	\$19,179.39
Amount Paid:	\$0.00
Balance Due:	\$19,179.39

Kamykowski & Taylor, P.C.

222 S. Central Ave., Suite 1100

Clayton, Missouri 63105

Phone: 314.665.3280

George (Doe) v. Bearden
For Services rendered between
December 20, 2019 – January 19, 2021

Invoice Date: May 10, 2022

Item	Date	Description	hrs.	Rate	Total	Billed By
Review/analyze	2/28/2020	Review Scheduling and Trial Order and confirm all deadlines have been calendared.	0.1	\$150.00	\$15.00	ENR
TOTAL			0.1		\$15.00	ENR
Communicate (other outside counsel)	1/19/2021	Correspondences with co-counsel regarding dismissing 3 state counts in Complaint.	0.2	\$375.00	\$75.00	JCS
Review/analyze	1/15/2021	Receive and review notices of subpoenas to be served on all of Plaintiff's employees.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	1/15/2021	Correspondences with defense counsel regarding notices of subpoenas to be served on all of Plaintiff's employees.	0.1	\$375.00	\$37.50	JCS
Review/analyze	1/5/2021	Receive and review Order establishing new discovery and dispositive motion deadlines.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/29/2020	Correspondences with all counsel regarding Court Order denying continuance of deadlines, generally, and plan for discovery, specifically, depositions moving forward including taking them virtually and deadlines for same.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/29/2020	Correspondences with co-counsel regarding plan for depositions, who to produce, who to request, how to produce/take them (virtually v. in person) and timeframe of same.	0.1	\$375.00	\$37.50	JCS
Review/analyze	12/28/2020	Receive and review Order Denying Extension of Deadlines, generally.	0.2	\$375.00	\$75.00	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other external)	9/4/2020	Telephone conference with all co-counsel regarding case status.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	9/1/2020	Correspondence with all counsel regarding disclosure of Plaintiff's experts and reports.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	9/1/2020	Receive and review Plaintiff's expert witness disclosures and reports and records of Plaintiff.	0.2	\$375.00	\$75.00	JCS
Review/analyze	8/12/2020	Receive and forward for processing DOC document production.	0.2	\$375.00	\$75.00	JCS
Review/analyze	7/31/2020	Receive and review pleadings regarding discovery extensions	0.2	\$375.00	\$75.00	JCS
Review/analyze	6/22/2020	Receive and review Defendant Bearden's initial discovery served on Plaintiff, process to file, and calendar deadline for answers and responses.	0.3	\$375.00	\$112.50	JCS
Communicate (other outside counsel)	4/23/2020	Receive and review various correspondences between J. Ammann and M. Pennycuff regarding subpoena for DOC documents.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	4/20/2020	Correspondences with co-counsel regarding moving forward with discovery, specifically subpoena to DOC and serving Defendant Bearden with written discovery.	0.2	\$375.00	\$75.00	JCS
Review/analyze	2/28/2020	Receive and review Defendant Bearden's Answer and Affirmative Defenses.	0.2	\$375.00	\$75.00	JCS
Review/analyze	2/28/2020	Receive and review Defendant Bearden's Initial Rule 26 Disclosures	0.2	\$375.00	\$75.00	JCS
Review/analyze	1/17/2020	Receive and review notice of appearance filed by Nicolas Taulbee on behalf of Edward Bearden	0.1	\$375.00	\$37.50	JCS
Appear for/attend	1/7/2020	Attend meeting with all co-counsel regarding case status and strategy.	0.2	\$375.00	\$75.00	JCS
Draft/revise	12/20/2019	Continue to prepare entry of appearances for me and R. Gavin.	0.2	\$375.00	\$75.00	JCS
TOTAL			3.4		\$1,275.00	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other external)	1/6/2021	Receive and review email correspondence from Mr. Ammann and Mr. Taulbee regarding statute of limitations and dismissal of claims.	0.1	\$425.00	\$42.50	RJG
Review/analyze	1/5/2021	Receive and review Court order granting Motion to Amend Scheduling Order.	0.1	\$425.00	\$42.50	RJG
Review/analyze	8/3/2020	Receive and review Plaintiff's responses to Defendant's written discovery requests.	0.4	\$425.00	\$170.00	RJG
Communicate (other external)	7/22/2020	Receive and review email correspondence from Mr. Taulbee and Mr. Ammann regarding Plaintiff's responses to Defendant's discovery requests.	0.1	\$425.00	\$42.50	RJG
Review/analyze	4/30/2020	Review pleadings and discovery in preparation for strategy conference with J. Snow.	0.7	\$425.00	\$297.50	RJG
Communicate (other external)	4/28/2020	Receive and review email correspondence from co-counsel regarding depositions of witnesses.	0.2	\$425.00	\$85.00	RJG
Communicate (other external)	4/23/2020	Receive and review email correspondence from Mr. Ammann regarding subpoena directed to Department of Corrections.	0.1	\$425.00	\$42.50	RJG
Appear for/attend	2/28/2020	Receive and review Answer of Edward Bearden.	0.2	\$425.00	\$85.00	RJG
Appear for/attend	2/28/2020	Receive and review Defendant Edward Bearden's Rule 26 Initial Disclosures.	0.2	\$425.00	\$85.00	RJG
Review/analyze	2/14/2020	Receive and review scheduling order entered by Court.	0.1	\$425.00	\$42.50	RJG
Communicate (other external)	2/10/2020	Receive and review email correspondence from Mr. Ammann regarding Rule 26 Initial Disclosures and proposed scheduling order.	0.2	\$425.00	\$85.00	RJG
Communicate (other external)	1/16/2020	Receive and review email correspondence from counsel regarding scheduling order.	0.2	\$425.00	\$85.00	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Review/analyze	1/9/2020	Receive and review Rule 16 Notice entered by Court.	0.1	\$425.00	\$42.50	RJG
Plan and prepare for	1/7/2020	Review file in preparation for conference call with all counsel.	0.2	\$425.00	\$85.00	RJG
Appear for/attend	1/7/2020	Attend meeting with all co-counsel regarding case status and strategy.	0.1	\$425.00	\$42.50	RJG
TOTAL			3.0		\$1,275.00	RJG
GRAND TOTAL			6.5		\$2,565.00	

Law Office of Joan M. Swartz
3348 Greenwood Blvd.
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(314) 471-2032

Law Office of Joan M. Swartz

SLU Law Clinic Cases

Balance \$19,329.39
Invoice # 00696
Invoice Date May 10, 2022
Payment Terms
Due Date

George (Doe) v. Bearden

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
02/03/2021	JCS	Draft Documents	Prepare Notice of Change of Address	\$375.00	0.2	\$75.00
02/03/2021	JCS	Correspondence	Various correspondences with all counsel regarding upcoming party and witness depositions.	\$375.00	0.2	\$75.00
02/08/2021	JCS	Correspondence	Telephone correspondence with co-counsel to discuss deposition testimony, upcoming depositions and case theories moving forward.	\$375.00	0.2	\$75.00
02/18/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding upcoming depositions.	\$375.00	0.1	\$37.50
02/25/2021	JCS	Confer with co-counsel	Telephone conference call with J. Ammann to catch up on depositions in all cases.	\$375.00	0.1	\$37.50
03/05/2021	JCS	Confer with opposing counsel	Continued correspondences with all counsel regarding depositions.	\$375.00	0.1	\$37.50
03/12/2021	JCS	Correspondence	Continued correspondences with all counsel regarding party depositions.	\$375.00	0.1	\$37.50
03/15/2021	JCS	Correspondence	Correspondences with team and with defense counsel regarding reopening settlement negotiations before 20+ more depositions and trial prep occurs; Correspondences with co-counsel regarding upcoming depositions and strategy for same.	\$375.00	0.5	\$187.50
03/15/2021	JCS	Draft Correspondence	Continue to prepare supplemental disclosures.	\$375.00	0.1	\$37.50
03/24/2021	JCS	Confer with co-counsel	Phone conference with J. Ammann and B. Roediger to discuss settlement, specifically demand amounts and strategy for making same.	\$375.00	0.2	\$75.00
03/28/2021	JCS	Correspondence	Make demand via email to defense counsel.	\$375.00	0.2	\$75.00
03/31/2021	JCS	Confer with co-counsel	Correspondence with co-counsel re: discussions with Defense Counsel relating to settlement.	\$375.00	0.1	\$37.50

04/01/2021	JCS	Confer with co-counsel	Continued correspondences with co-counsel regarding settlement negotiations and supplemental disclosures.	\$375.00	0.1	\$37.50
04/02/2021	JCS	Confer with opposing counsel	Correspondence with P. Brown and N. Taublee to schedule April 6th mediation.	\$375.00	0.1	\$37.50
04/02/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding mediation, specifically our position re: mediator, value of each case, and to-do's between now and mediation including mediation statement to prepare and calls to clients to make.	\$375.00	0.3	\$112.50
04/04/2021	JCS	Draft Documents	Continue to prepare Plaintiffs' Joint Mediation Statement; Correspondences with co-counsel regarding same.	\$375.00	0.2	\$75.00
04/05/2021	JCS	Confer with opposing counsel	Correspondences with opposing counsel regarding cancellation of mediation.	\$375.00	0.1	\$37.50
04/05/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding mediation statement and then cancellation of mediation.	\$375.00	0.1	\$37.50
04/05/2021	JCS	Draft Documents	Finalize and submit mediation statement.	\$375.00	0.1	\$37.50
04/06/2021	JCS	Confer with co-counsel	Correspondence with J. Ammann and B. Rodieger regarding to-do's following defense counsel's abrupt cancellation of mediation.	\$375.00	0.1	\$37.50
04/07/2021	JCS	Confer with opposing counsel	Correspondences with defense counsel regarding discovery, deposition scheduling, kicking trial settings and discovery cut-off dates	\$375.00	0.2	\$75.00
04/07/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding discovery, deposition scheduling, kicking trial settings and discovery cut-off dates, and testimony elicited and to be elicited.	\$375.00	0.2	\$75.00
04/12/2021	JCS	Correspondence	Correspondences with defense counsel regarding Joint Motion to Continue Scheduling Order deadlines in Doe case.	\$375.00	0.2	\$75.00
04/13/2021	JCS	Review	Receive and review Court Order resetting case for trial and other relevant pretrial deadlines; calendar same.	\$375.00	0.3	\$112.50
04/13/2021	JCS	Review	Receive and review Court order extending discovery deadlines and revising scheduling orders in consolidated cases.	\$375.00	0.1	\$37.50
04/15/2021	JCS	Correspondence	Various correspondences with team re: party depositions.	\$375.00	0.1	\$37.50
04/16/2021	JCS	Correspondence	Correspondences with all counsel re: party depositions.	\$375.00	0.2	\$75.00
05/14/2021	JCS	Confer with co-counsel	Conference call with co-counsel to discuss defense strategy and to-do's.	\$375.00	0.1	\$37.50
06/11/2021	JCS	Correspondence	Correspondences with co-counsel to set up meeting to discuss cases.	\$375.00	0.1	\$37.50
06/15/2021	JCS	Conference	Meet with co-counsel and team to go over all cases, prepare to-dos and discuss strategy.	\$375.00	0.4	\$150.00
06/16/2021	JCS	Correspondence	Correspondence to all counsel of record canceling Briesacher's deposition.	\$375.00	0.1	\$37.50
07/08/2021	JCS	Correspondence	Correspondences with all counsel regarding call from Katie Moore from Kansas City Star and plan for media involvement moving forward.	\$375.00	0.1	\$37.50
07/13/2021	JCS	Correspondence	Correspondences with all counsel regarding upcoming depositions in consolidated cases.	\$375.00	0.1	\$37.50

07/14/2021	JCS	Correspondence	Telephone conference with team re: strategy of cases moving forward.	\$375.00	0.2	\$75.00
07/29/2021	JCS	Confer with co-counsel	Call w/ John Ammann re: strategy and to-dos with discovery deadline being tomorrow, July 30, 2021.	\$375.00	0.2	\$75.00
08/01/2021	JCS	Correspondence	Correspondence with co-counsel regarding Defendant Bearden's shifts and hours worked	\$375.00	0.1	\$37.50
08/06/2021	JCS	Review	Receive and review telephone logs from DOJ/DOC; Correspondence with J. Ammann, co-counsel, regarding same	\$375.00	0.2	\$75.00
08/06/2021	JCS	Review	Receive and review telephone logs from DOJ/DOC; Correspondence with J. Ammann, co-counsel, regarding same	\$375.00	0.2	\$75.00
08/13/2021	JCS	Review	Receive and initial review Defendants' Daubert Motions	\$375.00	0.2	\$75.00
08/20/2021	JCS	Correspondence	Telephone correspondence with Laurel Stevenson re: cases and MAP program and mediation v. informal resolution of each.	\$375.00	0.2	\$75.00
08/20/2021	JCS	Draft Documents	Prepare settlement correspondence to L. Stevenson and send her same, along with May 2021 settlement statement.	\$375.00	0.3	\$112.50
08/22/2021	JCS	Review	Review Defendants' Motions to Exclude Expert Opinions.	\$375.00	0.2	\$75.00
08/22/2021	JCS	Draft Documents	Begin to prepare Plaintiffs' Responses to Defendants' Motions to Exclude Expert Opinions.	\$375.00	0.4	\$150.00
08/26/2021	JCS	Correspondence	Telephone conference call with MAP Coordinator to discuss and schedule mediation	\$375.00	0.2	\$75.00
08/29/2021	JCS	Confer with co-counsel	Correspondence with co-counsel re; upcoming mediations and strategy for same.	\$375.00	0.1	\$37.50
08/30/2021	JCS	Draft Documents	Continue to prepare Responses in Opposition to Defendant(s)' Motion to Exclude Expert Opinions	\$375.00	0.4	\$150.00
08/30/2021	JCS	File	Finalize and file Plaintiff's Responses in Opposition to Defendant(s)' Motion to Exclude Expert Opinions	\$375.00	0.2	\$75.00
08/30/2021	JCS	Correspondence	Ongoing correspondences with co-counsel regarding responses to dispositive and daubert motions	\$375.00	0.2	\$75.00
09/03/2021	JCS	Correspondence	Correspondence with team re: upcoming deadlines and mediation.	\$375.00	0.2	\$75.00
09/07/2021	JCS	Attend Mediation	Attend Part I of mediation with all counsel and Laurel Stevenson	\$375.00	0.5	\$187.50
09/07/2021	JCS	Review	Review file and settlements and verdicts found to prepare for mediation with all counsel and Laurel Stevenson	\$375.00	0.2	\$75.00
09/09/2021	JCS	Correspondence	Correspondence with various attorneys re: "summary jury trial" to evaluate same	\$375.00	0.6	\$225.00
09/21/2021	JCS	Correspondence	Correspondences with team re: consolidation and trial settings	\$375.00	0.1	\$37.50
09/24/2021	JCS	Correspondence	Correspondences with team re: consolidation and review motion prepare to do same	\$375.00	0.1	\$37.50
09/29/2021	JCS	Review	Receive and review Court Order on experts.	\$375.00	0.1	\$37.50
10/11/2021	JCS	Revise documents	Redline motion and suggestions in support of motion to consolidate; correspondences with team re: same	\$375.00	0.3	\$112.50
10/21/2021	JCS	Review	Receive and review correspondence from Laurel Stevenson re: her efforts to get answer from AGs office on issue of consolidation	\$375.00	0.1	\$37.50

10/26/2021	JCS	Review	Receive and review defendant's opposition to consolidation	\$375.00	0.1	\$37.50
10/27/2021	JCS	Confer with co-counsel	Conference call regarding Motion to Consolidate, Defendant's Response and need for reply	\$375.00	0.1	\$37.50
11/17/2021	JCS	Review	Receive and review Orders from Judge Phillips re: consolidating cases and deadlines moving forward, including trial date and all pre-trial deadline.	\$375.00	0.2	\$75.00
11/17/2021	JCS	Confer with co-counsel	Confer with team re: consolidation, deadlines, and next steps.	\$375.00	0.2	\$75.00
11/22/2021	JCS	Correspondence	Attend Part I of mediation with all counsel and Laurel Stevenson	\$375.00	0.1	\$37.50
11/22/2021	JCS	Correspondence	Correspondences with co-counsel re: mediation in this matter.	\$375.00	0.2	\$75.00
11/23/2021	JCS	Confer with co-counsel	Confer with team re: mediation in consolidated cases per Court Order.	\$375.00	0.2	\$75.00
11/29/2021	JCS	Confer with co-counsel	Confer with team re: plan for this week, specifically mediation of consolidated cases Wednesday 12/1.	\$375.00	0.1	\$37.50
11/30/2021	JCS	Confer with co-counsel	Various correspondences with co-counsel regarding consolidated cases and mediation	\$375.00	0.2	\$75.00
12/01/2021	JCS	Attend Mediation	Attend Mediation in Consolidated Cases (per Court Order); Correspondence with team before and after same; Receive summary correspondence from Laurel Stevenson re: same.	\$375.00	0.8	\$300.00
12/02/2021	JCS	Confer with co-counsel	Ongoing correspondences with team following mediation and settlement numbers	\$375.00	0.1	\$37.50
12/03/2021	JCS	Confer with co-counsel	Correspondences with team regarding trial strategy and schedule.	\$375.00	0.3	\$112.50
12/08/2021	JCS	Draft Documents	Continue to prepare writ for T. Dean to appear at trial	\$375.00	0.2	\$75.00
12/13/2021	JCS	Draft Documents	Prepare writ for T. Dean to appeal at trial, file and serve same	\$375.00	0.2	\$75.00
12/22/2021	JCS	Confer with co-counsel	Team meeting with co-counsel re: pre-trial to-do's and trial strategy.	\$375.00	0.6	\$225.00
12/27/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
12/28/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
12/29/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
01/03/2022	JCS	Draft Documents	Continue to prepare and finalize Motions in Limine.	\$375.00	0.2	\$75.00
01/04/2022	JCS	Confer with co-counsel	Confer with co-counsel regarding pre-trial team meeting and pre-trial deadlines	\$375.00	0.2	\$75.00
01/04/2022	JCS	Review	Review request for writ filed by defendant; confer with team re: same	\$375.00	0.2	\$75.00
01/04/2022	JCS	Review and revise	Review and continue to prepare stipulations	\$375.00	0.2	\$75.00
01/06/2022	JCS	Confer with co-counsel	Confer with co-counsel regarding trial strategy and other pre-trial filings and to-do's	\$375.00	0.4	\$150.00
01/06/2022	JCS	Prepare for court hearing	Prepare trial binder	\$375.00	0.4	\$150.00
01/10/2022	JCS	Draft Documents	Review Defendant's Motions in Limine; Begin to draft response to Defendant's Motions in Limine; Correspondences with all counsel re: same; Continue to prepare witness list and trial brief.	\$375.00	0.4	\$150.00
01/11/2022	JCS	Draft Documents	Continue to prepare exhibit list, Rule 415 Notice and preliminary Voir Dire questions.	\$375.00	0.4	\$150.00

01/12/2022	JCS	Confer with co-counsel	Confer with co-counsel re: trial exhibits and trial to-dos; Continue to prepare for trial.	\$375.00	0.3	\$112.50
01/13/2022	JCS	Draft Documents	Confer with team; Continue to prepare witness list for trial.	\$375.00	0.3	\$112.50
01/13/2022	JCS	Review	Receive and review Defendant's witness list, exhibit list, and jury questions.	\$375.00	0.2	\$75.00
01/14/2022	JCS	Confer with co-counsel	Confer with team re: Defendant's witness list and our response to same.	\$375.00	0.2	\$75.00
01/14/2022	JCS	Draft Documents	Continue to prepare Response to Defendant's Motions in Limine	\$375.00	0.2	\$75.00
01/17/2022	JCS	Draft Documents	Continue to prepare: Plaintiffs' Response to Defendant's Motions in Limines; Plaintiffs' Motion to Strike Defendant's Experts and Exhibit List; Plaintiff's Jury Instructions; and Stipulations in preparation for consolidated trial.	\$375.00	0.5	\$187.50
01/17/2022	JCS	Research	Research issues in Defendant's Motion in Limine to prepare response to same.	\$375.00	0.2	\$75.00
01/18/2022	JCS	Draft Documents	Continue to prepare and finalize Plaintiffs' Response to Defendant's Motions in Limine	\$375.00	0.2	\$75.00
01/19/2022	JCS	Confer with co-counsel	Meeting with co-counsel re: pretrial and trial.	\$375.00	0.5	\$187.50
01/19/2022	JCS	Review	Begin to review cases cited throughout Motions in Limine to prepare for pretrial	\$375.00	0.3	\$112.50
01/20/2022	JCS	Prepare for court hearing	Prepare for pretrial, specifically arguments on Plaintiffs' and Defendant's Motions in Limine	\$375.00	1.0	\$375.00
01/21/2022	JCS	Attend court hearing	Attend pretrial in Kansas City; Travel to/from.	\$375.00	4.0	\$1,500.00
01/21/2022	JCS	Review	Receive and review Court's docket entries and Orders following pretrial.	\$375.00	0.1	\$37.50
01/24/2022	JCS	Review	Receive and review Court Order re: Plaintiffs' Motion to Exclude Testimony of Maya Gasa.	\$375.00	0.1	\$37.50
01/24/2022	JCS	Correspondence	Receive and review correspondence from Court re: trial being continued; initial correspondences with the court, opposing counsel and team re: new trial setting	\$375.00	0.2	\$75.00
01/26/2022	JCS	Correspondence	Ongoing correspondences with court, opposing counsel and team re: new trial setting	\$375.00	0.2	\$75.00
01/27/2022	JCS	Review	Receive and review new consolidated trial setting; notify clients, experts and current and prior team re: same.	\$375.00	0.3	\$112.50
03/21/2022	JCS	Correspondence	Correspondence with T. Dean re: pre-trial meeting, plans for consolidated trial, etc.	\$375.00	0.2	\$75.00
03/24/2022	JCS	Correspondence	Correspondences with prison to set up pre-trial (consolidated cases) meeting w/ Dean	\$375.00	0.1	\$37.50
03/28/2022	JC	Draft/Revise	Prepare letter to Ms. Wright requesting in-person trial preparation meeting with J. Snow and Teri Dean.	\$150.00	0.1	\$15.00
03/28/2022	JC	Draft filings	Begin preparation of Plaintiffs' Request for Writ of Habeas Corpus Ad Testificandum related to Teri Dean.	\$150.00	0.1	\$15.00
03/28/2022	JCS	Correspondence	Correspondence with prison to schedule pre-trial meeting with T. Dean.	\$375.00	0.2	\$75.00
04/05/2022	JCS	Review and confer	Prepare and file writ for Dean; Correspondence with team re: outlines, topics, pre-trial meeting plans	\$375.00	0.3	\$112.50

04/06/2022	JCS	Conference	Attend pre-trial meeting with team; Confer with clerk and courtroom deputy to get details on voir dire seating chart, jury seating/rules, lunches, etc.; Correspondences with defense counsel re: exhibits for trial and access to same and rulings on motions in limine.	\$375.00	1.0	\$375.00
04/08/2022	JCS	Review	Review demonstrative chart circulated by J. Ammann and compare to Dean's housing assignments to illustrate when Bearden and Dean would have been in the same place at the same time; Correspondences with team re: demonstrative.	\$375.00	0.2	\$75.00
04/11/2022	JCS	Review	Review exhibits/link from defense counsel; review defense counsel's notes on MILs; prepare voir dire map; compile documents for voir dire; Ongoing correspondences with team re: pre-trial strategy, to-do's, etc.	\$375.00	0.4	\$150.00
04/11/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 1-7 to be used at trial.	\$150.00	0.1	\$15.00
04/12/2022	JCS	Review	Review EOA filed by Abbie Rothermich	\$375.00	0.1	\$37.50
04/13/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 8-10 and 22-23 to be used at trial.	\$150.00	0.1	\$15.00
04/14/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 24-33 to be used at trial.	\$150.00	0.1	\$15.00
04/15/2022	JCS	Correspondence	Correspondence with T. Dean re: pre-trial meeting and trial appearance and what to expect; Continued correspondence with Vandalia re: April 22nd visit with T. Dean to adjust time for same; Correspondence with team re: trial strategy issues.	\$375.00	0.5	\$187.50
04/15/2022	JCS	Review	Review defendants exhibits and discuss job charts with co-counsel J. Ammann.	\$375.00	0.3	\$112.50
04/19/2022	JCS	Correspondence	Correspondences with team re: ongoing trial prep and strategy.	\$375.00	0.2	\$75.00
04/19/2022	JCS	Review	Research and review Defense witness, D. Clay, for purposes of preparing her cross-examination	\$375.00	0.1	\$37.50
04/20/2022	JCS	Draft Documents	Prepare summary of Dean's case for use in opening; Begin to prepare direct examination of Dean for use at trial; Correspondences with team re: same; Continue to prepare and discuss demonstratives	\$375.00	1.5	\$562.50
04/21/2022	JCS	Conference	Pre-trial team meeting to discuss trial and further develop themes and strategy	\$375.00	0.5	\$187.50
04/22/2022	JCS	Meet with Client	Travel to/from Vandalia to meet with T. Dean to prep her for trial	\$375.00	2.0	\$750.00
04/23/2022	JCS	Transportation	Travel to Kansas City for trial.	\$375.00	1.0	\$375.00
04/24/2022	JCS	Confer with co-counsel	Ongoing discussions with co-counsel re: case strategy.	\$375.00	0.3	\$112.50
04/25/2022	JCS	Attend court hearing	Attend and partake in day one of trial, including voir dire, openings and start of plaintiffs' case in chief; Prepare for day two of trial.	\$375.00	3.4	\$1,275.00
04/26/2022	JCS	Attend court hearing	Attend and partake in day two of trial; Prepare expert for day three of trial.	\$375.00	3.5	\$1,312.50
04/27/2022	JCS	Attend court hearing	Attend and partake in day three of trial.	\$375.00	2.5	\$937.50
04/28/2022	JCS	Attend court hearing	Attend and partake in day four of trial.	\$375.00	2.0	\$750.00

04/29/2022	JCS	Attend court hearing	Return travel from trial back to St. Louis.	\$375.00	1.0	\$375.00
05/07/2022	JCS	Correspondence	Correspondences with my prior firm, Kamykowski Gavin and Smith, to obtain time and expense reports to include in Plaintiffs' Motion for Fees.	\$375.00	0.4	\$150.00
05/08/2022	JCS	Draft Documents	Continue to prepare Plaintiffs' Motion for Attorney Fees; Discuss declarations, other exhibits, etc., to attach to same.	\$375.00	0.3	\$112.50
05/09/2022	JCS	Draft Documents	Continue to prepare Motion for Attorney Fees; Correspondences with team re: same.	\$375.00	0.2	\$75.00
05/09/2022	JCS	Research	Research reasonable attorney rates to apply to hours in order to continue to prepare Motion for Attorney Fees; Correspondences with team re: same.	\$375.00	0.3	\$112.50
05/10/2022	JCS	Draft Documents	Continue to prepare declaration; Continue to prepare Motion for Attorney's Fees.	\$375.00	1.0	\$375.00
05/10/2022	JC	Draft filings	Prepare Declaration of Jenifer C. Snow to be filed with Plaintiffs' Motion for Attorneys' Fees; Continue preparation of exhibits to be filed with Plaintiffs' Motion for Attorneys' Fees.	\$150.00	1.5	\$225.00
Non-billable Time Entries:						
03/16/2021	JCS	Deposition	Appear for and attend deposition of Vevia Sturm	\$375.00	0.6	\$225.00
04/07/2021	JCS	Correspondence	Attend Defendant Bearden's Deposition.	\$375.00	0.4	\$150.00

Totals: **52.8 \$18,975.00**

Expenses

Date	EE	Activity	Description	Cost	Quantity	Line Total
04/22/2022	JC	Mileage	Travel to/from Vandalia, MO for trial preparation with inmate Teri Dean.	\$27.70	1.0	\$27.70
05/04/2022	JC	Reimbursable Expense	Jenifer hotel for trial 4.23.22 - 4.30.22 (split 4 ways).	\$305.64	1.0	\$305.64
05/04/2022	JC	Reimbursable Expense	Trial Expenses – Travel for trial (split 4 ways).	\$21.05	1.0	\$21.05

Expense Total: **\$354.39**

Notes:

JC Total: 2.0 hours; \$300.00
JCS Total: 50.8 hours; \$18,675.00

Time Entry Sub-Total:	\$18,975.00
Expense Sub-Total:	\$354.39
Sub-Total:	\$19,329.39
Total:	\$19,329.39
Amount Paid:	\$0.00
Balance Due:	\$19,329.39

Kamykowski & Taylor, P.C.

222 S. Central Ave., Suite 1100

Clayton, Missouri 63105

Phone: 314.665.3280

Keil v. Bearden

Invoice Date: May 10, 2022

For Services rendered between

May 18, 2018 – January 20, 2021

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	12/7/2018	Finalize the proposed amended scheduling order and e-file same with the United States District Court, Western District of Missouri.	0.9	\$150.00	\$135.00	DR
TOTAL			0.9		\$135.00	DR
Draft/revise	6/11/2020	Continue preparation of Motion for Entry of Scheduling Order and Scheduling Order to be filed with the Court.	0.3	\$150.00	\$45.00	ENR
Document Production/Creation/Preparation	3/4/2020	Continue preparation of documents to be produced with Plaintiffs' Response to Bearden's Second Request for Production.	0.2	\$150.00	\$30.00	ENR
Document Production/Creation/Preparation	3/2/2020	Prepare documents to be produced with Plaintiffs' Response to Bearden's Second Request for Production.	0.7	\$150.00	\$105.00	ENR
TOTAL			1.2		\$180.00	ENR
Communicate (other outside counsel)	1/20/2021	Correspondences with all counsel regarding depositions of Leslie Carsey, Aaron York and Carrie Pfeifer.	0.2	\$375.00	\$75.00	JCS
Review/analyze	1/5/2021	Receive and review Order establishing new discovery and dispositive motion deadlines.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	12/31/2020	Correspondences with co-counsel regarding Motion to Continue Scheduling Deadline.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other outside counsel)	12/31/2020	Correspondences with all counsel regarding discovery deadlines, specifically depositions and whereabouts of same.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/29/2020	Correspondences with all counsel regarding Court Order denying continuance of deadlines, generally, and plan for discovery, specifically, depositions moving forward including taking them virtually and deadlines for same.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/29/2020	Correspondences with co-counsel regarding plan for depositions, who to produce, who to request, how to produce/take them (virtually v. in person) and timeframe of same.	0.1	\$375.00	\$37.50	JCS
Draft/revise	12/21/2020	Continue to prepare Joint Motion to Continue Generally the Discovery Deadline, Dispositive Motion Deadline, and Daubert Motion Deadline	0.2	\$375.00	\$75.00	JCS
Review/analyze	11/19/2020	Receive and review Defendant Bearden's First Supplemental Responses and Objections to Plaintiff's First Request for Production.	0.2	\$375.00	\$75.00	JCS
Review/analyze	10/1/2020	Review documents and confer with J. Ammann, B. Rodiger and R. Gavin regarding document production (.4); Bates label documents to be produced (.1).	0.5	\$375.00	\$187.50	JCS
Communicate (other external)	9/9/2020	Continue to prepare email to defense counsel regarding party and fact witness depositions.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	9/4/2020	Telephone conference with all co-counsel regarding case status.	0.2	\$375.00	\$75.00	JCS
Communicate (other external)	9/2/2020	Correspondence with co-counsel to schedule conference call.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	8/26/2020	Correspondence with co-counsel regarding Plaintiff's initial discovery to serve on Defendants.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Draft/revise	8/25/2020	Continue to prepare discovery directed to Defendant Bearden.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	7/22/2020	Correspondences with team regarding subsequent therapy records and experts to send same to.	0.3	\$375.00	\$112.50	JCS
Communicate (other external)	7/16/2020	Receive and review correspondence from M. Pennycuff regarding phone records to be produced.	0.1	\$375.00	\$37.50	JCS
Review/analyze	6/19/2020	Receive and review docket entry entering Amended Scheduling Order and calendar dates as-needed.	0.2	\$375.00	\$75.00	JCS
Review/analyze	6/19/2020	Receive and review Order setting case for trial and all deadlines associated with same and meet with E. Roth and K. Corley regarding same.	0.3	\$375.00	\$112.50	JCS
Communicate (other external)	6/15/2020	Correspondence with Ms. McIlvaine, Judge Phillip's deputy, to send her copy of Second Amended Scheduling Order for entry pursuant to docket entry.	0.1	\$375.00	\$37.50	JCS
Draft/revise	6/11/2020	Prepare Motion for Entry of Joint Second Amended Scheduling Order in Consolidated Cases	0.3	\$375.00	\$112.50	JCS
Draft/revise	6/11/2020	Finalize Joint Second Amended Scheduling Order in Consolidated Cases	0.2	\$375.00	\$75.00	JCS
Draft/revise	6/1/2020	Continue to prepare second amended joint scheduling order.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	6/1/2020	Continued correspondence with Defense counsel regarding second amended joint scheduling order.	0.1	\$375.00	\$37.50	JCS
Draft/revise	5/29/2020	Draft second amended scheduling order given COVID limitations and delays.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	5/26/2020	Correspondence to Defense Counsel regarding status of case, need for amended Scheduling Order, Expert discovery and party discovery.	0.2	\$375.00	\$75.00	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Review/analyze	5/19/2020	Review Interrogatories directed to Defendant Bearden drafted by J. Ammann; Evaluate how to serve in all cases and suggest additional discovery to serve; Correspondence with co-counsel regarding same.	0.3	\$375.00	\$112.50	JCS
Communicate (other external)	5/15/2020	Correspondence with co-counsel regarding Scheduling Order and need of new timeline of case.	0.2	\$375.00	\$75.00	JCS
Review/analyze	5/1/2020	Review, revise and continue to update information regarding fact witnesses and their whereabouts for purposes of responding to N. Taulbee's request for depositions of same.	0.3	\$375.00	\$112.50	JCS
Review/analyze	5/1/2020	Continue to review files, specifically pleadings, Rule 26 disclosures to identify witnesses for all parties, and documents produced by DOC to continue to analyze same.	0.4	\$375.00	\$150.00	JCS
Communicate (other external)	4/27/2020	Correspondence with C. Atwell regarding mediation invoice received to inquire about same as I thought it had been paid by co-counsel J. Ammann.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	4/27/2020	Correspondence with co-counsel regarding fact witness discovery.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	4/22/2020	Correspondence with co-counsel, J. Ammann regarding discovery to serve on Defendant Bearden.	0.1	\$375.00	\$37.50	JCS
Review/analyze	4/8/2020	Receive and review Order canceling pretrial and trial.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	4/7/2020	Correspondences with all counsel regarding witness depositions.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	3/2/2020	Correspondence with all counsel regarding discovery, specifically Plaintiff's objections, answers and responses and regarding requested DOC depositions.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Research	2/17/2020	Research lay witness contact information.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	2/12/2020	Conference call with S. McGraugh regarding offender-witness project, specifically regarding our needs of information, i.e., if they are incarcerated or not currently and what their contact information is if they have been released.	0.2	\$375.00	\$75.00	JCS
Review/analyze	2/7/2020	Receive and review order from court consolidating case with Betz, Dean and Zieser for purposes of discovery only and establishing deadlines for discovery and dispositive motions.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	2/7/2020	Continued correspondences with co-counsel regarding documents to request and depositions to get lined up following order consolidating cases.	0.1	\$375.00	\$37.50	JCS
Appear for/attend	2/6/2020	Attend lunch meeting with co-counsel and Dora Schriro.	0.7	\$375.00	\$262.50	JCS
Draft/revise	2/5/2020	Prepare discovery scheduling order and correspondences with co-counsel regarding filing same.	0.1	\$375.00	\$37.50	JCS
Review/analyze	2/5/2020	Review file and notes to continue to update and create deposition list and send/receive correspondences between/among co-counsel regarding strategy for same.	0.3	\$375.00	\$112.50	JCS
Communicate (other outside counsel)	1/8/2020	Correspondence with all counsel regarding consolidating case.	0.1	\$375.00	\$37.50	JCS
Appear for/attend	1/7/2020	Attend meeting with all co-counsel regarding case status and strategy.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	1/6/2020	Correspondences among Plaintiff's counsel regarding Motion to Consolidate.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other external)	12/17/2019	Correspondence with J. Ammann regarding Defendant's expert disclosure deadline of December 16, 2019 and us receiving nothing.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	12/12/2019	Correspondence with all counsel regarding consolidating pending cases for purposes of discovery.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/10/2019	Correspondence with all counsel regarding consolidating pending cases for discovery.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/3/2019	Review materials and attend conference call with all co-counsel to discuss strategy and to-dos.	0.4	\$375.00	\$150.00	JCS
Communicate (other external)	10/30/2019	Receive and review cross-gender frisks training manual.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	10/24/2019	Continued correspondence regarding SAGR.	0.2	\$375.00	\$75.00	JCS
Time	10/14/2019	Review Dr. Schriro's expert report (.7); Call with Dr. Schriro to finalize expert report (.9); Review Dr. Piasecki's expert report (.2); Call with Dr. Piasecki to finalize expert report (.3); Discuss with team amending pleadings to add V. Strum back in as party-defendant (.3).	2.4	\$375.00	\$900.00	JCS
Time	10/8/2019	Execute fee agreement with Dr. Schriro, prison-system expert.	0.2	\$375.00	\$75.00	JCS
Time	10/1/2019	Review Complaint and other documents in preparation for telephone conferences with experts (0.3); Telephone conference with forensic psychiatry expert (0.9); Telephone conference with liability expert (1.3); Multiple telephone conferences with co-counsel (0.4).	2.9	\$375.00	\$1,087.50	JCS
Time	9/24/2019	Conference call with R. Gavin, J. Ammann, B. Roediger, and S. McGraugh regarding plans for moving case forward.	0.6	\$375.00	\$225.00	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	8/28/2019	Meet with team to discuss case to-dos.	.5	\$375.00	\$187.50	JCS
Time	8/14/2019	Receive umpteen amount of record received from the DOC and exchange correspondence with J. Ammann regarding review of same.	0.4	\$375.00	\$150.00	JCS
Time	8/1/2019	Various correspondences with R. Gavin and J. Ammann regarding 30(b)(6) notices and Amendments to the Petition; Continue to prepare 30(b)(6) notices and (30(b)(2) duces tecum.	1.5	\$375.00	\$562.50	JCS
Time	7/29/2019	Review Protective Order (.1); Correspondence with counsel of record regarding Protective Order (.1).	0.2	\$375.00	\$75.00	JCS
Time	7/18/2019	Receive and review emails from counsel of record regarding scheduling order.	0.2	\$375.00	\$75.00	JCS
Time	7/15/2019	Correspondences with counsel of record and Plaintiff's counsel team regarding scheduling order.	0.3	\$375.00	\$112.50	JCS
Time	7/15/2019	Continued correspondence with team regarding scheduling order.	0.2	\$375.00	\$75.00	JCS
Time	7/9/2019	Correspondence with Plaintiff's team regarding exclusionary trial dates for 2020 for purposes of finalizing the scheduling order.	0.2	\$375.00	\$75.00	JCS
Time	7/3/2019	Conference call with team to discuss strategy.	0.4	\$375.00	\$150.00	JCS
Time	7/2/2019	Correspondence with team to schedule conference call to discuss scheduling order and strategy moving forward.	0.5	\$375.00	\$187.50	JCS
Time	7/1/2019	Review drafts of scheduling order for entry.	0.2	\$375.00	\$75.00	JCS
Time	6/26/2019	Continued correspondences with counsel of record regarding lifting the stay.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	6/24/2019	Review Proposed Motion to Lift Stay; Correspondence with Plaintiff's team regarding same.	0.1	\$375.00	\$37.50	JCS
Time	4/29/2019	Receive and Review Order Granting Joint Motion to Extend Stay until July 1, 2019.	0.1	\$375.00	\$37.50	JCS
Time	4/25/2019	Correspondences with all counsel of record regarding extension of stay of proceedings.	0.2	\$375.00	\$75.00	JCS
Time	4/24/2019	Correspondence with Plaintiffs' counsel regarding continued stay; Review and review Joint Motion for Continued Stay.	0.1	\$375.00	\$37.50	JCS
Time	2/1/2019	Correspondences with K. Keil regarding newspaper article and her results re: not returning to CCC.	0.2	\$375.00	\$75.00	JCS
Time	1/28/2019	Receive and review DOC's objections to Plaintiff's initial discovery to Defendant Bearden.	0.4	\$375.00	\$150.00	JCS
Time	12/17/2018	Conference with plaintiff counsel team regarding discovery and trial preparation.	2	\$375.00	\$750.00	JCS
Time	12/10/2018	Telephone conference call with J. Ammann, B. Rodieger, and S. McGraugh regarding cases, including to-dos and fees.	0.5	\$375.00	\$187.50	JCS
Time	12/6/2018	Various correspondences with all counsel of record to discuss dates for new scheduling order per Court Order.	0.5	\$375.00	\$187.50	JCS
Time	12/3/2018	Draft Amended Scheduling Order.	1.5	\$375.00	\$562.50	JCS
Time	12/2/2018	Correspondence with counsel of record regarding protective order and amended scheduling order.	2.8	\$375.00	\$1,050.00	JCS
Time	11/29/2018	Correspondence with J. Amman regarding case to-do's; Telephone conference with client, Karen Keil.	1.2	\$375.00	\$450.00	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	11/13/2018	Receive and review correspondence from mediator regarding potential conflict; Receive and review all parties' responses to same.	0.3	\$375.00	\$112.50	JCS
Time	11/12/2018	Continue to draft 30(b)(6) motion; Correspondences with team regarding Mr. Bearden's deposition including travel arrangements and substance.	0.5	\$375.00	\$187.50	JCS
Time	11/9/2018	Continue to review 30(b)(6) topic and deposition topics for Mr. Bearden and/or corporate representatives and the DOC; Further correspondences with J. Ammann et al. regarding same.	1.5	\$375.00	\$562.50	JCS
Time	11/2/2018	Correspondence with counsel of record to reschedule Mr. Bearden's deposition.	0.2	\$375.00	\$75.00	JCS
Time	11/1/2018	Review and revise Protective Order; Review and comment on list of experts S. McGraugh and R. Gavin found; Initial preparation of 30(b)(6) subpoena and accompanying exhibit including contacting DOC to inquire who to address subpoena to.	1.1	\$375.00	\$412.50	JCS
Time	10/31/2018	Receive and review deposition notice for Mr. Bearden.	0.2	\$375.00	\$75.00	JCS
Time	10/30/2018	Telephone conference with team; Review and redline Proposed Protective Order; Review proposed experts.	1.1	\$375.00	\$412.50	JCS
Time	10/29/2018	Continued correspondence with SLU Law Clinic regarding Mr. Bearden's deposition, mediation, and experts.	0.5	\$375.00	\$187.50	JCS
Time	10/25/2018	Review relevant rules and draft 30(b)(6) subpoena.	0.5	\$375.00	\$187.50	JCS
Time	10/24/2018	Correspondence with team regarding Plaintiff's answers and responses to Defendant Bearden's initial discovery.	0.4	\$375.00	\$150.00	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	10/18/2018	Conference call with SLU Law Clinic to discuss case to-dos and general strategies.	0.5	\$375.00	\$187.50	JCS
Time	10/15/2018	Review and revise Plaintiff's initial discovery objections, answers and responses; Follow up on other to-dos to prepare for Mr. Bearden's deposition, mediation, and expert disclosures.	1.5	\$375.00	\$562.50	JCS
Time	9/19/2018	Continued correspondences among counsel of record to schedule Mr. Bearden's deposition.	0.4	\$375.00	\$150.00	JCS
Time	9/12/2018	Continued correspondences to schedule Mr. Bearden's deposition.	0.4	\$375.00	\$150.00	JCS
Time	9/7/2018	Correspondences with counsel of record to schedule Mr. Bearden's deposition.	0.4	\$375.00	\$150.00	JCS
Time	8/16/2018	Conference call to discuss mediators.	0.4	\$375.00	\$150.00	JCS
Time	8/14/2018	Various correspondences and research into mediators to circulate to all counsel of record.	0.5	\$375.00	\$187.50	JCS
Time	8/10/2018	Receive and review correspondences from counsel of record regarding joint scheduling order.	0.4	\$375.00	\$150.00	JCS
Time	7/31/2018	Receive and review Defendant Sturm's Motion to Dismiss.; Receive and review Defendant Edward Bearden's Answer and Affirmative Defenses.	0.5	\$375.00	\$187.50	JCS
Time	7/12/2018	Revise Plaintiff's Motion to Extend Deadlines for Filing of Joint Proposed Scheduling Order and Rule 26(f) Conference; Various correspondences with John Ammann regarding same.	0.4	\$375.00	\$150.00	JCS
Time	6/29/2018	Team Conference Call.	0.5	\$375.00	\$187.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	5/28/2018	Continue to review and revise release and Complaint; correspondence with J. Ammann regarding same.	0.8	\$375.00	\$300.00	JCS
Time	5/24/2018	Correspondence with J. Ammann and conference with R. Gavin regarding Release and KGS's involvement in this suit moving forward; review and finalize Release.	0.8	\$375.00	\$300.00	JCS
Time	5/22/2018	Review complaint and records received to date; correspondence with co-counsel to address strategy; create file.	2.9	\$375.00	\$1,087.50	JCS
Time	5/18/2018	Meeting with John Ammann regarding prison assault cases.	2	\$375.00	\$750.00	JCS
Non-billable Time						
Time	11/15/2018	Attend Mr. Bearden's Deposition; Return travel to St. Louis; Prepare and file Plaintiff's Motion to Extend Scheduling Order Deadlines or, in the alternative, Motion for Leave to File Amended Scheduling Order.	11	\$375.00	\$4,125.00	JCS
Time	11/14/2018	Travel to Kansas City for Mr. Bearden's November 15, 2018 deposition.	4.5	\$375.00	\$1,687.50	JCS
TOTAL			64.1		\$18,225.00	JCS
Time	8/1/2019	Prepare exhibits to Motion to Amend Complaint.	0.3	\$150.00	\$45.00	KAR
Time	7/29/2019	Review Scheduling Order.	0.1	\$150.00	\$15.00	KAR
Time	12/12/2018	Review amended scheduling deadlines and adjust calendar accordingly	0.3	\$150.00	\$45.00	KAR
Time	9/10/2018	Review and process Plaintiff's Initial Disclosures.	0.2	\$150.00	\$30.00	KAR

Item	Date	Description	hrs.	Rate	Total	Billed By
Other Case Assessment, Development and Administration Time	8/28/2018	Calculate and calendar deadlines set forth in Scheduling and Trial Order entered on August 27, 2018.	0.6	\$150.00	\$90.00	KAR
	8/27/2018	Review and process scheduling and trial order and compare to joint scheduling order provided by the parties.	0.3	\$150.00	\$45.00	KAR
Time	8/16/2018	Review Joint Scheduling Plan and calendar same.	0.4	\$150.00	\$60.00	KAR
Time	6/27/2018	Review Order Setting Deadlines for Filing Joint Proposed Scheduling Order.	0.2	\$150.00	\$30.00	KAR
TOTAL			2.4		\$360.00	KAR
Review/analyze	1/5/2021	Receive and review Court order granting Motion to Amend Scheduling Order.	0.1	\$425.00	\$42.50	RJG
Review/analyze	11/19/2020	Receive and review Edward Bearden's Supplemental Responses to Plaintiff's First Request for Production.	0.2	\$425.00	\$85.00	RJG
Communicate (in firm)	10/1/2020	Review documents and confer with J. Snow regarding document production.	0.2	\$425.00	\$85.00	RJG
Communicate (other external)	9/4/2020	Telephone conference with all co-counsel regarding case status.	0.4	\$425.00	\$170.00	RJG
Communicate (other external)	9/2/2020	Receive and review email correspondence from Mr. Taulbee and Mr. Ammann regarding depositions of witnesses.	0.2	\$425.00	\$85.00	RJG
Communicate (other external)	7/22/2020	Exchange email correspondence with counsel regarding additional therapy records.	0.2	\$425.00	\$85.00	RJG
Review/analyze	6/19/2020	Receive and review Third Amended Scheduling Order entered by Court.	0.1	\$425.00	\$42.50	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other external)	6/5/2020	Receive and review email correspondence from counsel regarding amendment of scheduling order.	0.1	\$425.00	\$42.50	RJG
Communicate (other external)	5/14/2020	Exchange email correspondence among co-counsel regarding scheduling orders and related matters.	0.2	\$425.00	\$85.00	RJG
Review/analyze	4/30/2020	Review pleadings and discovery in preparation for strategy conference with J. Snow.	0.7	\$425.00	\$297.50	RJG
Review/analyze	4/8/2020	Receive and review Court order canceling pre-trial conference and trial setting.	0.1	\$425.00	\$42.50	RJG
Communicate (other external)	4/7/2020	Receive and review email correspondence from Mr. Taulbee regarding witnesses to be deposed.	0.1	\$425.00	\$42.50	RJG
Communicate (other external)	4/7/2020	Receive and review emails from all co-counsel regarding depositions to be conducted.	0.3	\$425.00	\$127.50	RJG
Communicate (other external)	4/7/2020	Receive and review email correspondence from Mr. Buchheit regarding witnesses to be produced for deposition.	0.1	\$425.00	\$42.50	RJG
Communicate (other external)	3/23/2020	Receive and review email correspondence from counsel regarding Plaintiff's responses to discovery.	0.2	\$425.00	\$85.00	RJG
Communicate (other external)	3/4/2020	Receive and review email correspondence from Mr. Ammann regarding production of communications with Dr. Schriro and attached documents.	0.2	\$425.00	\$85.00	RJG
Appear for/attend	3/2/2020	Receive and review Plaintiff's Response to Defendant's Request for Production.	0.2	\$425.00	\$85.00	RJG
Appear for/attend	2/20/2020	Receive and review email correspondence from Ms. Pennycuff regarding document production.	0.1	\$425.00	\$42.50	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Review/analyze	2/7/2020	Receive and review Court order granting Motion to Consolidate and exchange email correspondence with co-counsel regarding same.	0.3	\$425.00	\$127.50	RJG
Appear for/attend	2/6/2020	Attend lunch meeting with co-counsel and Dora Schriro.	0.7	\$425.00	\$297.50	RJG
Communicate (other external)	1/25/2020	Receive and review email correspondence from Ms. McGraugh regarding scheduling order.	0.1	\$425.00	\$42.50	RJG
Appear for/attend	1/14/2020	Receive and review email correspondence from Mr. Ammann and Mr. Taulbee regarding outstanding discovery issues.	0.1	\$425.00	\$42.50	RJG
Communicate (other external)	1/13/2020	Receive and review email correspondence from Mr. Taulbee and Mr. Ammann regarding deposition of Plaintiff.	0.2	\$425.00	\$85.00	RJG
Communicate (other external)	1/8/2020	Receive and review email correspondence from all counsel regarding Motion to Consolidate.	0.2	\$425.00	\$85.00	RJG
Communicate (other external)	1/8/2020	Receive and review email correspondence from counsel regarding the deposition of Plaintiff.	0.2	\$425.00	\$85.00	RJG
Plan and prepare for	1/7/2020	Review file in preparation for conference call with all counsel.	0.2	\$425.00	\$85.00	RJG
Appear for/attend	1/7/2020	Attend meeting with all co-counsel regarding case status and strategy.	0.2	\$425.00	\$85.00	RJG
Draft/revise	1/7/2020	Continue preparation of Motion to Consolidate.	0.7	\$425.00	\$297.50	RJG
Appear for/attend	12/20/2019	Receive and review correspondence from Mr. Ammann and Mr. Taulbee regarding Defendant's expert disclosures.	0.1	\$425.00	\$42.50	RJG
Communicate (other outside counsel)	12/19/2019	Exchange email correspondence with all co-counsel regarding Defendant's failure to disclose expert witnesses.	0.2	\$425.00	\$85.00	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other external)	12/13/2019	Receive and review email correspondence from Mr. Taulbee regarding Plaintiff's discovery responses.	0.2	\$425.00	\$85.00	RJG
Communicate (other external)	12/10/2019	Receive and review email correspondence from Mr. Ammann regarding consolidation of discovery in remaining cases.	0.1	\$425.00	\$42.50	RJG
Draft/revise	12/6/2019	Review and revise proposed Motion to Dismiss with Prejudice.	0.1	\$425.00	\$42.50	RJG
Communicate (other external)	12/3/2019	Review materials and attend conference call with all co-counsel.	1.1	\$425.00	\$467.50	RJG
Communicate (other external)	12/2/2019	Receive and review email correspondence from Mr. Ammann and Mr. Taulbee regarding the deposition of Karen Keil.	0.1	\$425.00	\$42.50	RJG
Communicate (other external)	11/25/2019	Receive and review email correspondence from Mr. Taulbee regarding the deposition of Plaintiff.	0.1	\$425.00	\$42.50	RJG
Communicate (other outside counsel)	11/22/2019	Receive and review email correspondence from Mr. Ammann regarding the deposition of Plaintiff.	0.1	\$425.00	\$42.50	RJG
Communicate (other external)	11/6/2019	Receive and review email correspondence from Mr. Taulbee regarding the deposition of Plaintiff.	0.1	\$425.00	\$42.50	RJG
Communicate (other external)	11/6/2019	Exchange email correspondence with all co-counsel regarding deposition of Plaintiff and potential motion to consolidate.	0.2	\$425.00	\$85.00	RJG
Time	10/15/2019	Exchange email correspondence with co-counsel regarding expert disclosures.	0.2	\$425.00	\$85.00	RJG
Review/analyze	10/15/2019	Review and analyze therapy records to be produced with expert witness disclosures.	0.4	\$425.00	\$170.00	RJG
Time	10/14/2019	Review draft reports prepared by expert witnesses.	0.4	\$425.00	\$170.00	RJG
Review/analyze	10/11/2019	Initial review and analysis of draft report received from Dora Schriro.	0.7	\$425.00	\$297.50	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Review/analyze	10/11/2019	Review and analyze report of Dr. Piasecki.	0.3	\$425.00	\$127.50	RJG
Time	10/3/2019	Review proposed expert retention agreement and exchange email correspondence with co-counsel regarding same.	0.2	\$425.00	\$85.00	RJG
Time	10/1/2019	Review Complaint and other documents in preparation for telephone conferences with experts (0.3); Telephone conference with forensic psychiatry expert (0.9); Telephone conference with liability expert (1.3); Multiple telephone conferences with co-counsel (0.4).	2.9	\$425.00	\$1,232.50	RJG
Time	9/3/2019	Receive and review Court order granting extension of time for Plaintiff to file reply.	0.1	\$425.00	\$42.50	RJG
Time	8/16/2019	Review and analyze Defendant's Suggestions in Opposition to Plaintiff's Motion for Leave to Amend.	0.5	\$425.00	\$212.50	RJG
Time	8/14/2019	Initial review of document production by Department of Corrections.	1.2	\$425.00	\$510.00	RJG
Time	8/14/2019	Exchange email correspondence with co-counsel regarding document production and related matters.	0.3	\$425.00	\$127.50	RJG
Time	8/9/2019	Receive email correspondence from Mr. Ammann regarding Department of Corrections document production.	0.1	\$425.00	\$42.50	RJG
Time	8/7/2019	Receive and review Joint Motion for Protective Order.	0.2	\$425.00	\$85.00	RJG
Time	8/2/2019	Complete preparation of Motion for Leave to Amend and Suggestions in Support.	0.3	\$425.00	\$127.50	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	8/1/2019	Continue preparation of Motion for Leave to Amend; Continue preparation of Suggestions in Support of Motion for Leave to Amend; Multiple email communications with J. Snow and J. Ammann regarding amended complaint and discovery; Prepare email correspondence to all counsel regarding Motion for Leave to Amend and discovery.	4.3	\$425.00	\$1,827.50	RJG
Time	7/31/2019	Research and continued preparation of Motion to Amend Complaint.	0.5	\$425.00	\$212.50	RJG
Time	7/24/2019	Receive and review amended scheduling order.	0.1	\$425.00	\$42.50	RJG
Time	7/22/2019	Receive and review email correspondence from counsel regarding proposed protective order.	0.2	\$425.00	\$85.00	RJG
Time	7/17/2019	Receive and review order granting Motion for Extension of Time to File Joint Proposed Amended Scheduling Order.	0.1	\$425.00	\$42.50	RJG
Time	7/17/2019	Continue preparation of Joint Proposed Amended Scheduling Order; Exchange email correspondence with co-counsel regarding potential expert and scheduling order; Prepare email correspondence to all counsel regarding scheduling order.	0.4	\$425.00	\$170.00	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	7/16/2019	Multiple email communications with co-counsel regarding scheduling order; Prepare proposed joint amended scheduling order; Exchange email correspondence with all counsel regarding extension of time to file joint proposed amended scheduling order; Review status of discovery prior to entry of stay; Prepare motion for extension of time to file joint proposed amended scheduling order.	1.7	\$425.00	\$722.50	RJG
Time	7/15/2019	Review prior discovery and scheduling documents; Exchange email correspondence with all plaintiff's counsel regarding scheduling order; Prepare Joint Proposed Scheduling Order.	0.8	\$425.00	\$340.00	RJG
Time	7/3/2019	Conference call with counsel regarding scheduling and trial preparation.	0.3	\$425.00	\$127.50	RJG
Time	7/2/2019	Exchange email correspondence with counsel regarding scheduling order.	0.1	\$425.00	\$42.50	RJG
Time	7/1/2019	Exchange email correspondence with co-counsel regarding scheduling order.	0.2	\$425.00	\$85.00	RJG
Time	1/8/2019	Receive and review email correspondence from Mr. Taulbee regarding proposed protective order.	0.1	\$425.00	\$42.50	RJG
Time	12/17/2018	Conference with plaintiff counsel team regarding discovery and trial preparation.	1.5	\$425.00	\$637.50	RJG
Time	12/11/2018	Receive and review email correspondence from Mr. Ammann regarding status.	0.1	\$425.00	\$42.50	RJG
Time	12/11/2018	Receive and review order amending scheduling deadlines.	0.1	\$425.00	\$42.50	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	12/10/2018	Receive and review email correspondence from Mr. Ammann regarding subpoena to Department of Corrections.	0.1	\$425.00	\$42.50	RJG
Time	12/6/2018	Receive and review email correspondence from defense counsel regarding amended scheduling order.	0.2	\$425.00	\$85.00	RJG
Time	12/4/2018	Receive and review email correspondence from Mr. Taulbee regarding proposed amended scheduling order.	0.1	\$425.00	\$42.50	RJG
Time	12/3/2018	Review proposed amended scheduling order.	0.3	\$425.00	\$127.50	RJG
Time	11/16/2018	Research and review PeopleMap report on Edward Bearden.	0.6	\$425.00	\$255.00	RJG
Time	11/16/2018	Receive and review treatment report of Plaintiff's therapist.	0.1	\$425.00	\$42.50	RJG
Time	11/15/2018	Receive and review Motion to Amend Scheduling Order.	0.1	\$425.00	\$42.50	RJG
Time	11/12/2018	Receive and review proposed list of Rule 30(b)(6) deposition topics.	0.2	\$425.00	\$85.00	RJG
Time	11/9/2018	Continue preparation of potential deposition topics and questions.	1.6	\$425.00	\$680.00	RJG
Time	11/8/2018	Exchange email correspondence with Mr. Ammann regarding deposition topics and expert disclosures; Review Federal Rules of Civil Procedure regarding expert witness disclosures.	1	\$425.00	\$425.00	RJG
Time	11/2/2018	Review pleadings, records and discovery in connection with preparing for the deposition of John Bearden and other discovery; Research regarding Missouri Department of Corrections, Chillicothe Correctional Center, and the Prison Rape Elimination Act.	1.8	\$425.00	\$765.00	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	11/2/2018	Receive and review email correspondence from all counsel regarding the deposition of Mr. Bearden.	0.2	\$425.00	\$85.00	RJG
Time	11/1/2018	Continue preparation of proposed protective order.	0.2	\$425.00	\$85.00	RJG
Time	10/31/2018	Review proposed stipulated protective order as edited by J. Ammann.	0.2	\$425.00	\$85.00	RJG
Time	10/30/2018	Attend telephone conference with all counsel for Plaintiff; Research regarding potential damages experts; Review notice of deposition, document request, and research regarding application of Rule 34 to deposition accompanied by document request.	1	\$425.00	\$425.00	RJG
Time	10/15/2018	Continue preparation of Answers to Interrogatories; Continue preparation of Responses to Request for Production.	0.5	\$425.00	\$212.50	RJG
Time	10/12/2018	Attend conference call with all counsel for Plaintiff.	0.5	\$425.00	\$212.50	RJG
Time	10/5/2018	Attend telephone conference with team regarding case status; Attend second telephone conference with team and representative of Missouri Attorney General.	0.6	\$425.00	\$255.00	RJG
Time	9/26/2018	Review proposed protective order and prepare email correspondence to co-counsel regarding same.	0.8	\$425.00	\$340.00	RJG
Time	9/19/2018	Receive and review Defendant's proposed protective order.	0.2	\$425.00	\$85.00	RJG
Time	9/14/2018	Receive and review Edward Bearden's Interrogatories and Request for Production Directed to Plaintiff.	0.2	\$425.00	\$85.00	RJG
Time	9/10/2018	Review and analyze Plaintiff's Rule 26 Disclosures and case status.	0.2	\$425.00	\$85.00	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	9/6/2018	Receive and review Scheduling and Trial Order.	0.1	\$425.00	\$42.50	RJG
Time	8/16/2018	Conference with J. Snow and co-counsel regarding mediator and related matters.	0.3	\$425.00	\$127.50	RJG
Time	8/8/2018	Telephone conference with team regarding pending Motion to Dismiss and other matters.	0.4	\$425.00	\$170.00	RJG
Time	7/31/2018	Receive and review Vevia Sturm's Motion to Dismiss and Memorandum in Support.	0.2	\$425.00	\$85.00	RJG
Time	6/29/2018	Telephone conference with co-counsel regarding scheduling order and related matters.	0.5	\$425.00	\$212.50	RJG
Time	6/27/2018	Receive and review Defendant's Reply in Support of Motion to Dismiss.	0.2	\$425.00	\$85.00	RJG
TOTAL			39.7		\$16,872.50	RJG
GRAND TOTAL			159.10		\$35,772.50	

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Law Office of Joan M. Swartz

SLU Law Clinic Cases

Balance \$21,091.89
Invoice # 00697
Invoice Date May 10, 2022
Payment Terms
Due Date

Keil v. Bearden

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
02/01/2021	JCS	Review	Review documents produced by DOC	\$375.00	1.0	\$375.00
02/03/2021	JCS	Draft Documents	Prepare Notice of Change of Address	\$375.00	0.2	\$75.00
02/03/2021	JCS	Correspondence	Various correspondences with all counsel regarding upcoming party and witness depositions.	\$375.00	0.2	\$75.00
02/08/2021	JCS	Correspondence	Telephone correspondence with co-counsel to discuss deposition testimony, upcoming depositions and case theories moving forward.	\$375.00	0.2	\$75.00
02/18/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding upcoming depositions.	\$375.00	0.1	\$37.50
02/25/2021	JCS	Confer with co-counsel	Telephone conference call with J. Ammann to catch up on depositions in all cases.	\$375.00	0.1	\$37.50
03/05/2021	JCS	Confer with opposing counsel	Continued correspondences with all counsel regarding depositions.	\$375.00	0.1	\$37.50
03/12/2021	JCS	Correspondence	Continued correspondences with all counsel regarding party depositions.	\$375.00	0.1	\$37.50
03/15/2021	JCS	Correspondence	Correspondences with team and with defense counsel regarding reopening settlement negotiations before 20+ more depositions and trial prep occurs; Correspondences with co-counsel regarding upcoming depositions and strategy for same.	\$375.00	0.5	\$187.50
03/15/2021	JCS	Draft Correspondence	Continue to prepare supplemental disclosures.	\$375.00	0.1	\$37.50
03/24/2021	JCS	Confer with co-counsel	Phone conference with J. Ammann and B. Roediger to discuss settlement, specifically demand amounts and strategy for making same.	\$375.00	0.2	\$75.00
03/28/2021	JCS	Correspondence	Make demand via email to defense counsel.	\$375.00	0.2	\$75.00
03/31/2021	JCS	Confer with co-counsel	Correspondence with co-counsel re: discussions with Defense Counsel relating to settlement.	\$375.00	0.1	\$37.50

04/01/2021	JCS	Confer with co-counsel	Continued correspondences with co-counsel regarding settlement negotiations and supplemental disclosures.	\$375.00	0.1	\$37.50
04/02/2021	JCS	Confer with opposing counsel	Correspondence with P. Brown and N. Taublee to schedule April 6th mediation.	\$375.00	0.1	\$37.50
04/02/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding mediation, specifically our position re: mediator, value of each case, and to-do's between now and mediation including mediation statement to prepare and calls to clients to make.	\$375.00	0.3	\$112.50
04/04/2021	JCS	Draft Documents	Continue to prepare Plaintiffs' Joint Mediation Statement; Correspondences with co-counsel regarding same.	\$375.00	0.2	\$75.00
04/05/2021	JCS	Confer with opposing counsel	Correspondences with opposing counsel regarding cancellation of mediation.	\$375.00	0.1	\$37.50
04/05/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding mediation statement and then cancellation of mediation.	\$375.00	0.1	\$37.50
04/05/2021	JCS	Draft Documents	Finalize and submit mediation statement.	\$375.00	0.1	\$37.50
04/06/2021	JCS	Confer with co-counsel	Correspondence with J. Ammann and B. Rodieger regarding to-do's following defense counsel's abrupt cancellation of mediation.	\$375.00	0.1	\$37.50
04/07/2021	JCS	Confer with opposing counsel	Correspondences with defense counsel regarding discovery, deposition scheduling, kicking trial settings and discovery cut-off dates	\$375.00	0.2	\$75.00
04/07/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding discovery, deposition scheduling, kicking trial settings and discovery cut-off dates, and testimony elicited and to be elicited.	\$375.00	0.2	\$75.00
04/13/2021	JCS	Review	Receive and review Court Order resetting case for trial and other relevant pretrial deadlines; calendar same.	\$375.00	0.3	\$112.50
04/13/2021	JCS	Review	Receive and review Court order extending discovery deadlines and revising scheduling orders in consolidated cases.	\$375.00	0.1	\$37.50
04/15/2021	JCS	Correspondence	Various correspondences with team re: party depositions.	\$375.00	0.1	\$37.50
04/16/2021	JCS	Correspondence	Correspondences with all counsel re: party depositions.	\$375.00	0.2	\$75.00
05/14/2021	JCS	Confer with co-counsel	Conference call with co-counsel to discuss defense strategy and to-do's.	\$375.00	0.1	\$37.50
06/11/2021	JCS	Correspondence	Correspondences with co-counsel to set up meeting to discuss cases.	\$375.00	0.1	\$37.50
06/15/2021	JCS	Conference	Meet with co-counsel and team to go over all cases, prepare to-dos and discuss strategy.	\$375.00	0.4	\$150.00
06/16/2021	JCS	Correspondence	Correspondence to all counsel of record canceling Briesacher's deposition.	\$375.00	0.1	\$37.50
07/08/2021	JCS	Correspondence	Correspondences with all counsel regarding call from Katie Moore from Kansas City Star and plan for media involvement moving forward.	\$375.00	0.1	\$37.50
07/13/2021	JCS	Correspondence	Correspondences with all counsel regarding upcoming depositions in consolidated cases.	\$375.00	0.1	\$37.50
07/14/2021	JCS	Correspondence	Telephone conference with team re: strategy of cases moving forward.	\$375.00	0.2	\$75.00
07/29/2021	JCS	Confer with co-counsel	Call w/ John Ammann re: strategy and to-dos with discovery deadline being tomorrow, July 30, 2021.	\$375.00	0.2	\$75.00

08/01/2021	JCS	Correspondence	Correspondence with co-counsel regarding Defendant Bearden's shifts and hours worked	\$375.00	0.1	\$37.50
08/06/2021	JCS	Review	Receive and review telephone logs from DOJ/DOC; Correspondence with J. Ammann, co-counsel, regarding same	\$375.00	0.2	\$75.00
08/13/2021	JCS	Review	Receive and initial review Defendants' Daubert Motions	\$375.00	0.2	\$75.00
08/20/2021	JCS	Correspondence	Telephone correspondence with Laurel Stevenson re: cases and MAP program and mediation v. informal resolution of each.	\$375.00	0.2	\$75.00
08/20/2021	JCS	Draft Documents	Prepare settlement correspondence to L. Stevenson and send her same, along with May 2021 settlement statement.	\$375.00	0.3	\$112.50
08/22/2021	JCS	Review	Review Defendants' Motions to Exclude Expert Opinions.	\$375.00	0.2	\$75.00
08/22/2021	JCS	Draft Documents	Begin to prepare Plaintiffs' Responses to Defendants' Motions to Exclude Expert Opinions.	\$375.00	0.4	\$150.00
08/26/2021	JCS	Correspondence	Telephone conference call with MAP Coordinator to discuss and schedule mediation	\$375.00	0.2	\$75.00
08/29/2021	JCS	Confer with co-counsel	Correspondence with co-counsel re; upcoming mediations and strategy for same.	\$375.00	0.1	\$37.50
08/30/2021	JCS	Draft Documents	Continue to prepare Responses in Opposition to Defendant(s)' Motion to Exclude Expert Opinions	\$375.00	0.4	\$150.00
08/30/2021	JCS	File	Finalize and file Plaintiff's Responses in Opposition to Defendant(s)' Motion to Exclude Expert Opinions	\$375.00	0.2	\$75.00
08/30/2021	JCS	Correspondence	Ongoing correspondences with co-counsel regarding responses to dispositive and daubert motions	\$375.00	0.2	\$75.00
09/03/2021	JCS	Correspondence	Correspondence with team re: upcoming deadlines and mediation.	\$375.00	0.2	\$75.00
09/07/2021	JCS	Attend Mediation	Attend Part I of mediation with all counsel and Laurel Stevenson	\$375.00	0.5	\$187.50
09/07/2021	JCS	Review	Review file and settlements and verdicts found to prepare for mediation with all counsel and Laurel Stevenson	\$375.00	0.2	\$75.00
09/09/2021	JCS	Correspondence	Correspondence with various attorneys re: "summary jury trial" to evaluate same	\$375.00	0.6	\$225.00
09/21/2021	JCS	Correspondence	Correspondences with team re: consolidation and trial settings	\$375.00	0.1	\$37.50
09/24/2021	JCS	Correspondence	Correspondences with team re: consolidation and review motion prepare to do same	\$375.00	0.1	\$37.50
09/29/2021	JCS	Review	Receive and review Court Order on experts.	\$375.00	0.1	\$37.50
10/11/2021	JCS	Revise documents	Redline motion and suggestions in support of motion to consolidate; correspondences with team re: same	\$375.00	0.3	\$112.50
10/21/2021	JCS	Review	Receive and review correspondence from Laurel Stevenson re: her efforts to get answer from AGs office on issue of consolidation	\$375.00	0.1	\$37.50
10/26/2021	JCS	Review	Receive and review defendant's opposition to consolidation	\$375.00	0.1	\$37.50
10/27/2021	JCS	Confer with co-counsel	Conference call regarding Motion to Consolidate, Defendant's Response and need for reply	\$375.00	0.1	\$37.50
11/17/2021	JCS	Review	Receive and review Orders from Judge Phillips re: consolidating cases and deadlines moving forward, including trial date and all pre-trial deadline.	\$375.00	0.2	\$75.00

11/17/2021	JCS	Confer with co-counsel	Confer with team re: consolidation, deadlines, and next steps.	\$375.00	0.2	\$75.00
11/22/2021	JCS	Correspondence	Attend Part I of mediation with all counsel and Laurel Stevenson	\$375.00	0.1	\$37.50
11/22/2021	JCS	Correspondence	Correspondences with co-counsel re: mediation in this matter.	\$375.00	0.2	\$75.00
11/23/2021	JCS	Confer with co-counsel	Confer with team re: mediation in consolidated cases per Court Order.	\$375.00	0.2	\$75.00
11/29/2021	JCS	Confer with co-counsel	Confer with team re: plan for this week, specifically mediation of consolidated cases Wednesday 12/1.	\$375.00	0.1	\$37.50
11/30/2021	JCS	Confer with co-counsel	Various correspondences with co-counsel regarding consolidated cases and mediation	\$375.00	0.2	\$75.00
12/01/2021	JCS	Attend Mediation	Attend Mediation in Consolidated Cases (per Court Order); Correspondence with team before and after same; Receive summary correspondence from Laurel Stevenson re: same.	\$375.00	0.8	\$300.00
12/02/2021	JCS	Confer with co-counsel	Ongoing correspondences with team following mediation and settlement numbers	\$375.00	0.1	\$37.50
12/03/2021	JCS	Confer with co-counsel	Correspondences with team regarding trial strategy and schedule.	\$375.00	0.3	\$112.50
12/08/2021	JCS	Draft Documents	Continue to prepare writ for T. Dean to appear at trial	\$375.00	0.2	\$75.00
12/13/2021	JCS	Draft Documents	Prepare writ for T. Dean to appeal at trial, file and serve same	\$375.00	0.2	\$75.00
12/22/2021	JCS	Confer with co-counsel	Team meeting with co-counsel re: pre-trial to-do's and trial strategy.	\$375.00	0.6	\$225.00
12/27/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
12/28/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
12/29/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
01/03/2022	JCS	Draft Documents	Continue to prepare and finalize Motions in Limine.	\$375.00	0.2	\$75.00
01/04/2022	JCS	Confer with co-counsel	Confer with co-counsel regarding pre-trial team meeting and pre-trial deadlines	\$375.00	0.2	\$75.00
01/04/2022	JCS	Review	Review request for writ filed by defendant; confer with team re: same	\$375.00	0.2	\$75.00
01/04/2022	JCS	Review and revise	Review and continue to prepare stipulations	\$375.00	0.2	\$75.00
01/06/2022	JCS	Confer with co-counsel	Confer with co-counsel regarding trial strategy and other pre-trial filings and to-do's	\$375.00	0.4	\$150.00
01/06/2022	JCS	Prepare for court hearing	Prepare trial binder	\$375.00	0.4	\$150.00
01/10/2022	JCS	Draft Documents	Review Defendant's Motions in Limine; Begin to draft response to Defendant's Motions in Limine; Correspondences with all counsel re: same; Continue to prepare witness list and trial brief.	\$375.00	0.4	\$150.00
01/11/2022	JCS	Draft Documents	Continue to prepare exhibit list, Rule 415 Notice and preliminary Voir Dire questions.	\$375.00	0.4	\$150.00
01/12/2022	JCS	Confer with co-counsel	Confer with co-counsel re: trial exhibits and trial to-dos; Continue to prepare for trial.	\$375.00	0.3	\$112.50
01/13/2022	JCS	Draft Documents	Confer with team; Continue to prepare witness list for trial.	\$375.00	0.3	\$112.50
01/13/2022	JCS	Review	Receive and review Defendant's witness list, exhibit list, and jury questions.	\$375.00	0.2	\$75.00

01/14/2022	JCS	Confer with co-counsel	Confer with team re: Defendant's witness list and our response to same.	\$375.00	0.2	\$75.00
01/14/2022	JCS	Draft Documents	Continue to prepare Response to Defendant's Motions in Limine	\$375.00	0.2	\$75.00
01/17/2022	JCS	Draft Documents	Continue to prepare: Plaintiffs' Response to Defendant's Motions in Limines; Plaintiffs' Motion to Strike Defendant's Experts and Exhibit List; Plaintiff's Jury Instructions; and Stipulations in preparation for consolidated trial.	\$375.00	0.5	\$187.50
01/17/2022	JCS	Research	Research issues in Defendant's Motion in Limine to prepare response to same.	\$375.00	0.2	\$75.00
01/18/2022	JCS	Draft Documents	Continue to prepare and finalize Plaintiffs' Response to Defendant's Motions in Limine	\$375.00	0.2	\$75.00
01/18/2022	JC	File	Finalize and file Plaintiffs' Response to Defendant's Motions in Limine.	\$150.00	0.5	\$75.00
01/19/2022	JCS	Confer with co-counsel	Meeting with co-counsel re: pretrial and trial.	\$375.00	0.5	\$187.50
01/19/2022	JCS	Review	Begin to review cases cited throughout Motions in Limine to prepare for pretrial	\$375.00	0.3	\$112.50
01/20/2022	JCS	Prepare for court hearing	Prepare for pretrial, specifically arguments on Plaintiffs' and Defendant's Motions in Limine	\$375.00	1.0	\$375.00
01/21/2022	JCS	Attend court hearing	Attend pretrial in Kansas City; Travel to/from.	\$375.00	4.0	\$1,500.00
01/21/2022	JCS	Review	Receive and review Court's docket entries and Orders following pretrial.	\$375.00	0.1	\$37.50
01/24/2022	JCS	Review	Receive and review Court Order re: Plaintiffs' Motion to Exclude Testimony of Maya Gasca.	\$375.00	0.1	\$37.50
01/24/2022	JCS	Correspondence	Receive and review correspondence from Court re: trial being continued; initial correspondences with the court, opposing counsel and team re: new trial setting	\$375.00	0.2	\$75.00
01/26/2022	JCS	Correspondence	Ongoing correspondences with court, opposing counsel and team re: new trial setting	\$375.00	0.2	\$75.00
01/27/2022	JCS	Review	Receive and review new consolidated trial setting; notify clients, experts and current and prior team re: same.	\$375.00	0.3	\$112.50
03/21/2022	JCS	Correspondence	Correspondence with T. Dean re: pre-trial meeting, plans for consolidated trial, etc.	\$375.00	0.2	\$75.00
03/21/2022	JCS	Correspondence	Correspondence with T. Dean re: pre-trial meeting, plans for consolidated trial, etc.	\$375.00	0.2	\$75.00
03/24/2022	JCS	Correspondence	Correspondences with prison to set up pre-trial (consolidated cases) meeting w/ Dean	\$375.00	0.1	\$37.50
03/28/2022	JC	Draft/Revise	Prepare letter to Ms. Wright requesting in-person trial preparation meeting with J. Snow and Teri Dean.	\$150.00	0.1	\$15.00
03/28/2022	JC	Draft filings	Begin preparation of Plaintiffs' Request for Writ of Habeas Corpus Ad Testificandum related to Teri Dean.	\$150.00	0.1	\$15.00
03/28/2022	JCS	Correspondence	Correspondence with prison to schedule pre-trial meeting with T. Dean.	\$375.00	0.2	\$75.00
04/05/2022	JCS	Review and confer	Prepare and file writ for Dean; Correspondence with team re: outlines, topics, pre-trial meeting plans	\$375.00	0.3	\$112.50

04/06/2022	JCS	Conference	Attend pre-trial meeting with team; Confer with clerk and courtroom deputy to get details on voir dire seating chart, jury seating/rules, lunches, etc.; Correspondences with defense counsel re: exhibits for trial and access to same and rulings on motions in limine.	\$375.00	1.0	\$375.00
04/08/2022	JCS	Review	Review demonstrative chart circulated by J. Ammann and compare to Dean's housing assignments to illustrate when Bearden and Dean would have been in the same place at the same time; Correspondences with team re: demonstrative.	\$375.00	0.2	\$75.00
04/11/2022	JCS	Review	Review exhibits/link from defense counsel; review defense counsel's notes on MILs; prepare voir dire map; compile documents for voir dire; Ongoing correspondences with team re: pre-trial strategy, to-do's, etc.	\$375.00	0.4	\$150.00
04/11/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 1-7 to be used at trial.	\$150.00	0.1	\$15.00
04/12/2022	JCS	Review	Review EOA filed by Abbie Rothermich	\$375.00	0.1	\$37.50
04/13/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 8-10 and 22-23 to be used at trial.	\$150.00	0.1	\$15.00
04/14/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 24-33 to be used at trial.	\$150.00	0.1	\$15.00
04/15/2022	JCS	Correspondence	Correspondence with T. Dean re: pre-trial meeting and trial appearance and what to expect; Continued correspondence with Vandalia re: April 22nd visit with T. Dean to adjust time for same; Correspondence with team re: trial strategy issues.	\$375.00	0.5	\$187.50
04/15/2022	JCS	Review	Review defendants exhibits and discuss job charts with co-counsel J. Ammann.	\$375.00	0.3	\$112.50
04/19/2022	JCS	Correspondence	Correspondences with team re: ongoing trial prep and strategy.	\$375.00	0.2	\$75.00
04/19/2022	JCS	Review	Research and review Defense witness, D. Clay, for purposes of preparing her cross-examination	\$375.00	1.0	\$375.00
04/20/2022	JCS	Draft Documents	Prepare summary of Dean's case for use in opening; Begin to prepare direct examination of Dean for use at trial; Correspondences with team re: same; Continue to prepare and discuss demonstratives	\$375.00	1.5	\$562.50
04/21/2022	JCS	Conference	Pre-trial team meeting to discuss trial and further develop themes and strategy	\$375.00	0.5	\$187.50
04/22/2022	JCS	Meet with Client	Travel to/from Vandalia to meet with T. Dean to prep her for trial	\$375.00	2.0	\$750.00
04/23/2022	JCS	Transportation	Travel to Kansas City for trial.	\$375.00	1.0	\$375.00
04/24/2022	JCS	Meet with Client	Meet with client to prepare her for trial; Discussions with co-counsel re: case strategy.	\$375.00	3.1	\$1,162.50
04/25/2022	JCS	Attend court hearing	Attend and partake in day one of trial, including voir dire, openings and start of plaintiffs' case in chief; Prepare for day two of trial.	\$375.00	3.4	\$1,275.00
04/26/2022	JCS	Attend court hearing	Attend and partake in day two of trial; Prepare expert for day three of trial.	\$375.00	3.5	\$1,312.50
04/27/2022	JCS	Attend court hearing	Attend and partake in day three of trial.	\$375.00	2.5	\$937.50
04/28/2022	JCS	Attend court hearing	Attend and partake in day four of trial.	\$375.00	2.0	\$750.00

04/29/2022	JCS	Attend court hearing	Return travel from trial back to St. Louis.	\$375.00	1.0	\$375.00
05/07/2022	JCS	Correspondence	Correspondences with my prior firm, Kamykowski Gavin and Smith, to obtain time and expense reports to include in Plaintiffs' Motion for Fees.	\$375.00	0.4	\$150.00
05/08/2022	JCS	Draft Documents	Continue to prepare Plaintiffs' Motion for Attorney Fees; Discuss declarations, other exhibits, etc., to attach to same.	\$375.00	0.3	\$112.50
05/09/2022	JCS	Draft Documents	Continue to prepare Motion for Attorney Fees; Correspondences with team re: same.	\$375.00	0.2	\$75.00
05/09/2022	JCS	Research	Research reasonable attorney rates to apply to hours in order to continue to prepare Motion for Attorney Fees; Correspondences with team re: same.	\$375.00	0.3	\$112.50
05/10/2022	JCS	Draft Documents	Continue to prepare declaration; Continue to prepare Motion for Attorney's Fees.	\$375.00	1.0	\$375.00
05/10/2022	JC	Draft filings	Prepare Declaration of Jenifer C. Snow to be filed with Plaintiffs' Motion for Attorneys' Fees; Continue preparation of exhibits to be filed with Plaintiffs' Motion for Attorneys' Fees.	\$150.00	1.5	\$225.00
Non-billable Time Entries:						
03/16/2021	JCS	Deposition	Appear for and attend deposition of Vevia Sturm	\$375.00	0.6	\$225.00
04/07/2021	JCS	Correspondence	Attend Defendant Bearden's Deposition.	\$375.00	0.4	\$150.00

Totals: **57.8 \$20,737.50**

Expenses

Date	EE	Activity	Description	Cost	Quantity	Line Total
04/22/2022	JC	Mileage	Travel to/from Vandalia, MO for trial preparation with inmate Teri Dean.	\$27.70	1.0	\$27.70
05/04/2022	JC	Reimbursable Expense	Jenifer hotel for trial 4.23.22 - 4.30.22 (split 4 ways).	\$305.64	1.0	\$305.64
05/04/2022	JC	Reimbursable Expense	Trial Expenses – Travel for trial (split 4 ways).	\$21.05	1.0	\$21.05

Expense Total: **\$354.39**

Notes:

JC Total: 2.5 hours; \$375.00
JCS Total: 55.3 hours; \$20,362.50

Time Entry Sub-Total:	\$20,737.50
Expense Sub-Total:	\$354.39
Sub-Total:	\$21,091.89
Total:	\$21,091.89
Amount Paid:	\$0.00
Balance Due:	\$21,091.89

Kamykowski & Taylor, P.C.

222 S. Central Ave., Suite 1100

Clayton, Missouri 63105

Phone: 314.665.3280

Zieser v. Bearden

For Services rendered between

November 7, 2018 – January 20, 2021

Invoice Date: May 10, 2022

Item	Date	Description	hrs.	Rate	Total	Billed By
Review/analyze	12/2/2019	Review Amended Scheduling Order.	0.1	\$150.00	\$15.00	ENR
TOTAL			0.1		\$15.00	ENR
Communicate (other outside counsel)	1/20/2021	Correspondences with all counsel regarding depositions of Leslie Carsey, Aaron York and Carrie Pfeifer.	0.2	\$375.00	\$75.00	JCS
Review/analyze	1/5/2021	Receive and review Order establishing new discovery and dispositive motion deadlines.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	12/31/2020	Correspondences with co-counsel regarding Motion to Continue Scheduling Deadline.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/31/2020	Correspondences with all counsel regarding discovery deadlines, specifically depositions and whereabouts of same.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/29/2020	Correspondences with all counsel regarding Court Order denying continuance of deadlines, generally, and plan for discovery, specifically, depositions moving forward including taking them virtually and deadlines for same.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/29/2020	Correspondences with co-counsel regarding plan for depositions, who to produce, who to request, how to produce/take them (virtually v. in person) and timeframe of same.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Draft/revise	12/21/2020	Continue to prepare Joint Motion to Continue Generally the Discovery Deadline, Dispositive Motion Deadline, and Daubert Motion Deadline	0.2	\$375.00	\$75.00	JCS
Communicate (other external)	9/9/2020	Continue to prepare email to defense counsel regarding party and fact witness depositions.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	9/4/2020	Telephone conference with all co-counsel regarding case status.	0.2	\$375.00	\$75.00	JCS
Communicate (other external)	9/2/2020	Correspondence with co-counsel to schedule conference call.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	8/26/2020	Correspondence with co-counsel regarding Plaintiff's initial discovery to serve on Defendants.	0.1	\$375.00	\$37.50	JCS
Draft/revise	8/25/2020	Continue to prepare discovery directed to Defendant Bearden.	0.2	\$375.00	\$75.00	JCS
Communicate (other external)	7/16/2020	Receive and review correspondence from M. Pennycuff regarding phone records to be produced.	0.1	\$375.00	\$37.50	JCS
Review/analyze	6/19/2020	Receive and review docket entry entering Amended Scheduling Order and calendar dates as-needed.	0.2	\$375.00	\$75.00	JCS
Communicate (other external)	6/15/2020	Correspondence with Ms. McIlvaine, Judge Phillip's deputy, to send her copy of Second Amended Scheduling Order for entry pursuant to docket entry.	0.1	\$375.00	\$37.50	JCS
Draft/revise	6/11/2020	Prepare Motion for Entry of Joint Second Amended Scheduling Order in Consolidated Cases	0.3	\$375.00	\$112.50	JCS
Draft/revise	6/11/2020	Finalize Joint Second Amended Scheduling Order in Consolidated Cases	0.2	\$375.00	\$75.00	JCS
Draft/revise	6/1/2020	Continue to prepare second amended joint scheduling order.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other outside counsel)	6/1/2020	Continued correspondence with Defense counsel regarding second amended joint scheduling order.	0.1	\$375.00	\$37.50	JCS
Draft/revise	5/29/2020	Draft second amended scheduling order given COVID limitations and delays.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	5/26/2020	Correspondence to Defense Counsel regarding status of case, need for amended Scheduling Order, Expert discovery and party discovery.	0.2	\$375.00	\$75.00	JCS
Review/analyze	5/19/2020	Review Interrogatories directed to Defendant Bearden drafted by J. Ammann; Evaluate how to serve in all cases and suggest additional discovery to serve; Correspondence with co-counsel regarding same.	0.3	\$375.00	\$112.50	JCS
Communicate (other external)	5/15/2020	Correspondence with co-counsel regarding Scheduling Order and need of new timeline of case.	0.2	\$375.00	\$75.00	JCS
Review/analyze	5/1/2020	Review, revise and continue to update information regarding fact witnesses and their whereabouts for purposes of responding to N. Taulbee's request for depositions of same.	0.3	\$375.00	\$112.50	JCS
Review/analyze	5/1/2020	Continue to review files, specifically pleadings, Rule 26 disclosures to identify witnesses for all parties, and documents produced by DOC to continue to analyze same.	0.4	\$375.00	\$150.00	JCS
Communicate (other external)	4/27/2020	Correspondence with C. Atwell regarding mediation invoice received to inquire about same as I thought it had been paid by co-counsel J. Ammann.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	4/27/2020	Correspondence with co-counsel regarding fact witness discovery.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other outside counsel)	4/22/2020	Correspondence with co-counsel, J. Ammann regarding discovery to serve on Defendant Bearden.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	4/7/2020	Correspondences with all counsel regarding witness depositions.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	3/2/2020	Correspondence with all counsel regarding discovery, specifically Plaintiff's objections, answers and responses and regarding requested DOC depositions.	0.1	\$375.00	\$37.50	JCS
Research	2/17/2020	Research lay witness contact information.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	2/12/2020	Conference call with S. McGraugh and her clinic students regarding offender-witness project, specifically regarding our needs of information, i.e., if they are incarcerated or not currently and what their contact information is if they have been released.	0.2	\$375.00	\$75.00	JCS
Appear for/attend	2/6/2020	Attend lunch meeting with co-counsel and Dora Schriro.	0.7	\$375.00	\$262.50	JCS
Review/analyze	2/6/2020	Receive and process DOC document production.	0.2	\$375.00	\$75.00	JCS
Draft/revise	2/5/2020	Prepare discovery scheduling order and correspondences with co-counsel regarding filing same.	0.1	\$375.00	\$37.50	JCS
Review/analyze	2/5/2020	Review file and notes to continue to update and create deposition list and send/receive correspondences between/among co-counsel regarding strategy for same.	0.3	\$375.00	\$112.50	JCS
Review/analyze	1/31/2020	Receive and review HIPAA release from Defendant Bearden for execution by Plaintiff.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Review/analyze	1/30/2020	Receive and review Defendant Bearden's First Interrogatories and First Request for Production directed to Plaintiff.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	1/27/2020	Exchange email correspondence with all counsel regarding status reports.	0.1	\$375.00	\$37.50	JCS
Review/analyze	1/24/2020	Receive and review Orders consolidating cases and reassigning case to Judge Phillips.	0.1	\$375.00	\$37.50	JCS
Communicate (in firm)	1/20/2020	Correspondence with co-counsel regarding upcoming deadlines and no ruling on pending motion to consolidate.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	1/8/2020	Correspondence with all counsel regarding consolidating case.	0.1	\$375.00	\$37.50	JCS
Appear for/attend	1/7/2020	Attend meeting with all co-counsel regarding case status and strategy.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	1/6/2020	Correspondences among Plaintiff's counsel regarding Motion to Consolidate.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	1/6/2020	Correspondences among Plaintiff's counsel regarding fees and expenses incurred to date and anticipated to be incurred in the future and procedure in place for same.	0.1	\$375.00	\$37.50	JCS
Document Production/Creation/Preparation	12/13/2019	Receive, review and process to file final (produced) expert reports.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	12/12/2019	Receive and review Judge Atwell's post-mediation report sent to Jill Morris.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	12/12/2019	Correspondence with all counsel regarding consolidating pending cases for purposes of discovery.	0.1	\$375.00	\$37.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other outside counsel)	12/10/2019	Correspondence with all counsel regarding consolidating pending cases for discovery.	0.1	\$375.00	\$37.50	JCS
Communicate (other external)	12/9/2019	Correspondence with K. Batcheller, Judge Atwell's assistant, regarding post-mediation status report; Correspondence with all counsel regarding same.	0.2	\$375.00	\$75.00	JCS
Review/analyze	12/6/2019	Review expert report from Dora.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	12/3/2019	Review materials and attend conference call with all co-counsel to discuss strategy and to-dos.	0.4	\$375.00	\$150.00	JCS
Appear for/attend	11/26/2019	Attend Mediation with Judge Atwell.	4	\$375.00	\$1,500.00	JCS
Communicate (other outside counsel)	11/25/2019	Receive and review email correspondence from Mr. Taulbee regarding protective order.	0.1	\$375.00	\$37.50	JCS
Review/analyze	11/25/2019	Receive and review Amended Scheduling Order.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	11/22/2019	Correspondence with all counsel regarding mediation specifics such as attendees, position regarding opening statements and request to not have any interaction between Plaintiff and Defendants.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	11/18/2019	Correspondence with team regarding mediation statement and travel plans to attend November 26th mediation.	0.1	\$375.00	\$37.50	JCS
Communicate (other outside counsel)	11/12/2019	Various correspondences with team regarding expert report due next month.	0.2	\$375.00	\$75.00	JCS
Communicate (other outside counsel)	11/7/2019	Correspondence with J. Ammann to prepare language for Subpoena on Corizon.	0.1	\$375.00	\$37.50	JCS
Appear for/attend	11/4/2019	Attend Pre-Mediation Call with Judge Atwell.	0.3	\$375.00	\$112.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	10/8/2019	Receive and review correspondence from mediator regarding mediation to-dos.	0.2	\$375.00	\$75.00	JCS
Time	9/30/2019	Evaluate need to amend pleadings and/or add additional parties.	0.2	\$375.00	\$75.00	JCS
Time	9/18/2019	Receive and review Mediation and Assessment Program Reminder that the post-mediation status report is due within 10 calendar days after the mediation.	0.1	\$375.00	\$37.50	JCS
Time	9/17/2019	Finalize and file updated designation of mediator form.	0.1	\$375.00	\$37.50	JCS
Time	9/12/2019	Prepare Joint Designation of Mediator forms and circulate to N. Taulbee, counsel for E. Bearden, to get his approval before filing by September 13, 2019 deadline.	0.3	\$375.00	\$112.50	JCS
Time	9/5/2019	Correspondences with all counsel to schedule mediation.	0.2	\$375.00	\$75.00	JCS
Time	9/3/2019	Review subpoena for DOC and send correspondence to team regarding same and to discuss mediation and consolidating discovery.	0.2	\$375.00	\$75.00	JCS
Time	8/28/2019	Meet with team to discuss case to-dos.	0.3	\$375.00	\$112.50	JCS
Time	8/23/2019	Correspondence with all attorneys regarding mediation and mediator; Correspondence with Plaintiff's attorneys regarding mediation coverage.	0.1	\$375.00	\$37.50	JCS
Time	8/16/2019	Receive and review correspondence from Jill Morris, MAP direction, regarding mediator designation and mediation deadline and calendar same.	0.2	\$375.00	\$75.00	JCS
Time	7/29/2019	Continue to prepare scheduling order and send/receive several correspondences among counsel of record regarding same.	0.3	\$375.00	\$112.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	6/26/2019	Continued correspondences with counsel of record regarding lifting the stay.	0.1	\$375.00	\$37.50	JCS
Time	6/24/2019	Review Proposed Motion to Lift Stay; Correspondence with Plaintiff's team regarding same.	0.1	\$375.00	\$37.50	JCS
Time	4/29/2019	Receive and Review Order Granting Joint Motion to Extend Stay until July 1, 2019.	0.1	\$375.00	\$37.50	JCS
Time	4/26/2019	Receive and review filed Joint Motion to Extend Stay.	0.1	\$375.00	\$37.50	JCS
Time	4/25/2019	Correspondences with all counsel of record regarding extension of stay of proceedings.	0.2	\$375.00	\$75.00	JCS
Time	4/24/2019	Correspondence with Plaintiffs' counsel regarding continued stay; Review and review Joint Motion for Continued Stay.	0.1	\$375.00	\$37.50	JCS
Time	2/27/2019	Telephone conference with J. Ammann regarding Zeiser's DOJ interview.	0.2	\$375.00	\$75.00	JCS
Time	2/14/2019	Receive and review Rule 16 Order from Court; Correspondence with team regarding typos therein; Receive and review Order from Court granting Stay until May 1, 2019.	0.6	\$375.00	\$225.00	JCS
Time	2/13/2019	Continued correspondence with J. Ammann regarding stay and mediation pending Court's anticipated Order following Parties' Joint Motion for Stay.	0.2	\$375.00	\$75.00	JCS
Time	2/12/2019	Receive and review various correspondences between counsel of record regarding Joint Motion for Stay.	0.3	\$375.00	\$112.50	JCS
Time	2/8/2019	Prepare Joint Motion for Stay.	0.3	\$375.00	\$112.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	1/17/2019	Correspondence with counsel of record and K. Batcheller, Judge Atwell's legal assistant, regarding moving mediation from March 5th or March 7th.	0.3	\$375.00	\$112.50	JCS
Time	1/10/2019	Receive and review correspondence from Judge Atwell's assistant enclosing mediation details and specifics; Calendar came; Correspondence with co-counsel regarding same.	0.5	\$375.00	\$187.50	JCS
Time	1/4/2019	Correspondence with counsel of record regarding Designation of Mediator; Prepare and circulate drafted designation.	0.5	\$375.00	\$187.50	JCS
Time	12/27/2018	Correspondence with AG's office regarding meditation time and location and scheduling order.	0.2	\$375.00	\$75.00	JCS
Time	12/21/2018	Continued correspondence regarding mediation and amending scheduling order.	0.4	\$375.00	\$150.00	JCS
Time	12/20/2018	Correspondence with N. Taulbee regarding mediator, mediation dates, and amended the scheduling order.	0.5	\$375.00	\$187.50	JCS
Time	12/18/2018	Correspondences with Nicolas Taulbee, attorney general, regarding mediation deadline extension and mediators; Receive and review correspondences between J. Ammann and Jill Morris, mediation program manager, regarding same; Calendar new deadlines.	0.5	\$375.00	\$187.50	JCS
Time	12/17/2018	Correspondence with attorney general's office regarding mediators, mediation deadline and consent to extending same.	0.4	\$375.00	\$150.00	JCS
Time	12/10/2018	Telephone conference call with J. Ammann, B. Rodieger, and S. McGraugh regarding cases, including to-dos and fees.	0.5	\$375.00	\$187.50	JCS

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	12/2/2018	Correspondence with counsel of record to select new mediator to mediate case before January 7, 2019.	0.2	\$375.00	\$75.00	JCS
Time	11/14/2018	Review Rule 26 Initial Disclosures.	0.2	\$375.00	\$75.00	JCS
Time	11/7/2018	Telephone conference with SLU clinic regarding mediator disclosures; Receive and review scheduling order.	0.4	\$375.00	\$150.00	JCS
TOTAL			23		\$8,625.00	JCS
Time	7/31/2019	Review Scheduling Order.	0.1	\$150.00	\$15.00	KAR
Time	11/8/2018	Review joint proposed scheduling order and calendar deadlines containing within the same.	0.3	\$150.00	\$45.00	KAR
TOTAL			0.4		\$60.00	KAR
Draft/revise	12/30/2020	Continue preparation of Motion to Continue Scheduling Deadlines and exchange correspondence with co-counsel regarding same.	0.3	\$425.00	\$127.50	RJG
Appear for/attend	2/6/2020	Attend lunch meeting with co-counsel and Dora Schriro.	0.7	\$425.00	\$297.50	RJG
Review/analyze	1/24/2020	Receive and review order granting Motion to Consolidate.	0.1	\$425.00	\$42.50	RJG
Plan and prepare for	1/7/2020	Review file in preparation for conference call with all counsel.	0.2	\$425.00	\$85.00	RJG
Appear for/attend	1/7/2020	Attend meeting with all co-counsel regarding case status and strategy.	0.2	\$425.00	\$85.00	RJG
Review/analyze	12/12/2019	Review final drafts of expert reports.	0.4	\$425.00	\$170.00	RJG
Review/analyze	12/4/2019	Review and analyze draft report of Dora Schriro.	0.2	\$425.00	\$85.00	RJG
Review/analyze	11/27/2019	Review and analyze draft expert report.	0.2	\$425.00	\$85.00	RJG
Review/analyze	11/25/2019	Receive and review amended scheduling order.	0.1	\$425.00	\$42.50	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Communicate (other external)	11/11/2019	Receive and review email correspondence from Ms. Choate regarding expert reports.	0.2	\$425.00	\$85.00	RJG
Time	7/29/2019	Exchange email correspondence with all counsel regarding scheduling order.	0.2	\$425.00	\$85.00	RJG
Time	2/14/2019	Receive and review order granting Motion to Stay.	0.1	\$425.00	\$42.50	RJG
Time	2/13/2019	Receive and review Joint Motion to Stay All Proceedings.	0.1	\$425.00	\$42.50	RJG
Time	1/4/2019	Receive and review email correspondence from Mr. Taulbee regarding mediation.	0.1	\$425.00	\$42.50	RJG
Time	1/2/2019	Receive and review email correspondence from Mr. Taulbee regarding mediation.	0.1	\$425.00	\$42.50	RJG
Time	12/26/2018	Receive and review email correspondence from Mr. Ammann regarding mediator designation.	0.1	\$425.00	\$42.50	RJG
Time	12/21/2018	Receive and review email correspondence from counsel regarding mediation.	0.3	\$425.00	\$127.50	RJG
Time	12/19/2018	Telephone conference with Jose Bautista regarding mediators; Exchange email correspondence with team regarding mediators.	0.3	\$425.00	\$127.50	RJG
Time	12/18/2018	Receive and review correspondence between Ms. Morris and Mr. Ammann regarding mediation referral.	0.2	\$425.00	\$85.00	RJG
Time	12/12/2018	Receive and review email correspondence from Mr. Taulbee regarding mediation.	0.1	\$425.00	\$42.50	RJG
Time	12/2/2018	Receive and review email correspondence from all counsel regarding mediation.	0.2	\$425.00	\$85.00	RJG
Time	11/19/2018	Receive and review email correspondence from Mr. Shurin regarding mediation.	0.2	\$425.00	\$85.00	RJG

Item	Date	Description	hrs.	Rate	Total	Billed By
Time	11/14/2018	Receive and review proposed Rule 26 Initial Disclosures.	0.2	\$425.00	\$85.00	RJG
Time	11/9/2018	Review and analyze Joint Proposed Scheduling Plan.	0.2	\$425.00	\$85.00	RJG
Time	10/11/2018	Receive and review email correspondence from Mr. Taulbee and Mr. Ammann regarding Rule 16 Conference.	0.2	\$425.00	\$85.00	RJG
Time	9/10/2018	Receive and review answer on behalf of Edward Bearden.	0.1	\$425.00	\$42.50	RJG
Time	9/10/2018	Receive and review Rule 16 notice.	0.1	\$425.00	\$42.50	RJG
TOTAL			5.4		\$2,295.00	RJG
GRAND TOTAL			28.90		\$13,365.00	

Law Office of Joan M. Swartz
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Law Office of Joan M. Swartz

SLU Law Clinic Cases

Balance \$19,179.39
Invoice # 00698
Invoice Date May 10, 2022
Payment Terms
Due Date

Zieser v. Bearden

Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
02/03/2021	JCS	Draft Documents	Prepare Notice of Change of Address	\$375.00	0.2	\$75.00
02/03/2021	JCS	Correspondence	Various correspondences with all counsel regarding upcoming party and witness depositions.	\$375.00	0.2	\$75.00
02/08/2021	JCS	Correspondence	Telephone correspondence with co-counsel to discuss deposition testimony, upcoming depositions and case theories moving forward.	\$375.00	0.2	\$75.00
02/18/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding upcoming depositions.	\$375.00	0.1	\$37.50
02/25/2021	JCS	Confer with co-counsel	Telephone conference call with J. Ammann to catch up on depositions in all cases.	\$375.00	0.1	\$37.50
03/05/2021	JCS	Confer with opposing counsel	Continued correspondences with all counsel regarding depositions.	\$375.00	0.1	\$37.50
03/12/2021	JCS	Correspondence	Continued correspondences with all counsel regarding party depositions.	\$375.00	0.1	\$37.50
03/15/2021	JCS	Correspondence	Correspondences with team and with defense counsel regarding reopening settlement negotiations before 20+ more depositions and trial prep occurs; Correspondences with co-counsel regarding upcoming depositions and strategy for same.	\$375.00	0.5	\$187.50
03/15/2021	JCS	Draft Correspondence	Continue to prepare supplemental disclosures.	\$375.00	0.1	\$37.50
03/24/2021	JCS	Confer with co-counsel	Phone conference with J. Ammann and B. Roediger to discuss settlement, specifically demand amounts and strategy for making same.	\$375.00	0.2	\$75.00
03/28/2021	JCS	Correspondence	Make demand via email to defense counsel.	\$375.00	0.2	\$75.00
03/31/2021	JCS	Confer with co-counsel	Correspondence with co-counsel re: discussions with Defense Counsel relating to settlement.	\$375.00	0.1	\$37.50

04/01/2021	JCS	Confer with co-counsel	Continued correspondences with co-counsel regarding settlement negotiations and supplemental disclosures.	\$375.00	0.1	\$37.50
04/02/2021	JCS	Confer with opposing counsel	Correspondence with P. Brown and N. Taublee to schedule April 6th mediation.	\$375.00	0.1	\$37.50
04/02/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding mediation, specifically our position re: mediator, value of each case, and to-do's between now and mediation including mediation statement to prepare and calls to clients to make.	\$375.00	0.3	\$112.50
04/04/2021	JCS	Draft Documents	Continue to prepare Plaintiffs' Joint Mediation Statement; Correspondences with co-counsel regarding same.	\$375.00	0.2	\$75.00
04/05/2021	JCS	Confer with opposing counsel	Correspondences with opposing counsel regarding cancellation of mediation.	\$375.00	0.1	\$37.50
04/05/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding mediation statement and then cancellation of mediation.	\$375.00	0.1	\$37.50
04/05/2021	JCS	Draft Documents	Finalize and submit mediation statement.	\$375.00	0.1	\$37.50
04/06/2021	JCS	Confer with co-counsel	Correspondence with J. Ammann and B. Rodieger regarding to-do's following defense counsel's abrupt cancellation of mediation.	\$375.00	0.1	\$37.50
04/07/2021	JCS	Confer with opposing counsel	Correspondences with defense counsel regarding discovery, deposition scheduling, kicking trial settings and discovery cut-off dates	\$375.00	0.2	\$75.00
04/07/2021	JCS	Confer with co-counsel	Correspondences with co-counsel regarding discovery, deposition scheduling, kicking trial settings and discovery cut-off dates, and testimony elicited and to be elicited.	\$375.00	0.2	\$75.00
04/13/2021	JCS	Review	Receive and review Court order extending discovery deadlines and revising scheduling orders in consolidated cases.	\$375.00	0.1	\$37.50
04/15/2021	JCS	Correspondence	Various correspondences with team re: party depositions.	\$375.00	0.1	\$37.50
04/16/2021	JCS	Correspondence	Correspondences with all counsel re: party depositions.	\$375.00	0.2	\$75.00
05/14/2021	JCS	Confer with co-counsel	Conference call with co-counsel to discuss defense strategy and to-do's.	\$375.00	0.1	\$37.50
06/11/2021	JCS	Correspondence	Correspondences with co-counsel to set up meeting to discuss cases.	\$375.00	0.1	\$37.50
06/15/2021	JCS	Conference	Meet with co-counsel and team to go over all cases, prepare to-dos and discuss strategy.	\$375.00	0.4	\$150.00
06/16/2021	JCS	Correspondence	Correspondence to all counsel of record canceling Briesacher's deposition.	\$375.00	0.1	\$37.50
07/08/2021	JCS	Correspondence	Correspondences with all counsel regarding call from Katie Moore from Kansas City Star and plan for media involvement moving forward.	\$375.00	0.1	\$37.50
07/13/2021	JCS	Correspondence	Correspondences with all counsel regarding upcoming depositions in consolidated cases.	\$375.00	0.1	\$37.50
07/14/2021	JCS	Correspondence	Telephone conference with team re: strategy of cases moving forward.	\$375.00	0.2	\$75.00
07/27/2021	JCS	Correspondence	Correspondences regarding depositions.	\$375.00	0.2	\$75.00
07/29/2021	JCS	Confer with co-counsel	Call w/ John Ammann re: strategy and to-dos with discovery deadline being tomorrow, July 30, 2021.	\$375.00	0.2	\$75.00

08/01/2021	JCS	Correspondence	Correspondence with co-counsel regarding Defendant Bearden's shifts and hours worked	\$375.00	0.1	\$37.50
08/13/2021	JCS	Review	Receive and initial review Defendants' Daubert Motions	\$375.00	0.2	\$75.00
08/20/2021	JCS	Correspondence	Telephone correspondence with Laurel Stevenson re: cases and MAP program and mediation v. informal resolution of each.	\$375.00	0.2	\$75.00
08/20/2021	JCS	Draft Documents	Prepare settlement correspondence to L. Stevenson and send her same, along with May 2021 settlement statement.	\$375.00	0.3	\$112.50
08/22/2021	JCS	Review	Review Defendants' Motions to Exclude Expert Opinions.	\$375.00	0.2	\$75.00
08/22/2021	JCS	Draft Documents	Begin to prepare Plaintiffs' Responses to Defendants' Motions to Exclude Expert Opinions.	\$375.00	0.4	\$150.00
08/26/2021	JCS	Correspondence	Telephone conference call with MAP Coordinator to discuss and schedule mediation	\$375.00	0.2	\$75.00
08/29/2021	JCS	Confer with co-counsel	Correspondence with co-counsel re; upcoming mediations and strategy for same.	\$375.00	0.1	\$37.50
08/30/2021	JCS	Draft Documents	Continue to prepare Responses in Opposition to Defendant(s)' Motion to Exclude Expert Opinions	\$375.00	0.4	\$150.00
08/30/2021	JCS	File	Finalize and file Plaintiff's Responses in Opposition to Defendant(s)' Motion to Exclude Expert Opinions	\$375.00	0.2	\$75.00
08/30/2021	JCS	Correspondence	Ongoing correspondences with co-counsel regarding responses to dispositive and daubert motions	\$375.00	0.2	\$75.00
09/03/2021	JCS	Correspondence	Correspondence with team re: upcoming deadlines and mediation.	\$375.00	0.2	\$75.00
09/07/2021	JCS	Attend Mediation	Attend Part I of mediation with all counsel and Laurel Stevenson	\$375.00	0.5	\$187.50
09/07/2021	JCS	Review	Review file and settlements and verdicts found to prepare for mediation with all counsel and Laurel Stevenson	\$375.00	0.2	\$75.00
09/09/2021	JCS	Correspondence	Correspondence with various attorneys re: "summary jury trial" to evaluate same	\$375.00	0.6	\$225.00
09/21/2021	JCS	Correspondence	Correspondences with team re: consolidation and trial settings	\$375.00	0.1	\$37.50
09/24/2021	JCS	Correspondence	Correspondences with team re: consolidation and review motion prepare to do same	\$375.00	0.1	\$37.50
09/29/2021	JCS	Review	Receive and review Court Order on experts.	\$375.00	0.1	\$37.50
10/11/2021	JCS	Revise documents	Redline motion and suggestions in support of motion to consolidate; correspondences with team re: same	\$375.00	0.3	\$112.50
10/21/2021	JCS	Review	Receive and review correspondence from Laurel Stevenson re: her efforts to get answer from AGs office on issue of consolidation	\$375.00	0.1	\$37.50
10/26/2021	JCS	Review	Receive and review defendant's opposition to consolidation	\$375.00	0.1	\$37.50
10/27/2021	JCS	Confer with co-counsel	Conference call regarding Motion to Consolidate, Defendant's Response and need for reply	\$375.00	0.1	\$37.50
11/17/2021	JCS	Review	Receive and review Orders from Judge Phillips re: consolidating cases and deadlines moving forward, including trial date and all pre-trial deadline.	\$375.00	0.2	\$75.00
11/17/2021	JCS	Confer with co-counsel	Confer with team re: consolidation, deadlines, and next steps.	\$375.00	0.2	\$75.00

11/22/2021	JCS	Correspondence	Attend Part I of mediation with all counsel and Laurel Stevenson	\$375.00	0.1	\$37.50
11/22/2021	JCS	Correspondence	Correspondences with co-counsel re: mediation in this matter.	\$375.00	0.2	\$75.00
11/23/2021	JCS	Confer with co-counsel	Confer with team re: mediation in consolidated cases per Court Order.	\$375.00	0.2	\$75.00
11/29/2021	JCS	Confer with co-counsel	Confer with team re: plan for this week, specifically mediation of consolidated cases Wednesday 12/1.	\$375.00	0.1	\$37.50
11/30/2021	JCS	Confer with co-counsel	Various correspondences with co-counsel regarding consolidated cases and mediation	\$375.00	0.2	\$75.00
12/01/2021	JCS	Attend Mediation	Attend Mediation in Consolidated Cases (per Court Order); Correspondence with team before and after same; Receive summary correspondence from Laurel Stevenson re: same.	\$375.00	0.8	\$300.00
12/02/2021	JCS	Confer with co-counsel	Ongoing correspondences with team following mediation and settlement numbers	\$375.00	0.1	\$37.50
12/03/2021	JCS	Confer with co-counsel	Correspondences with team regarding trial strategy and schedule.	\$375.00	0.3	\$112.50
12/08/2021	JCS	Draft Documents	Continue to prepare writ for T. Dean to appear at trial	\$375.00	0.2	\$75.00
12/13/2021	JCS	Draft Documents	Prepare writ for T. Dean to appeal at trial, file and serve same	\$375.00	0.2	\$75.00
12/22/2021	JCS	Confer with co-counsel	Team meeting with co-counsel re: pre-trial to-do's and trial strategy.	\$375.00	0.6	\$225.00
12/27/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
12/28/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
12/29/2021	JCS	Draft Documents	Continue to prepare Motions in Limine	\$375.00	0.2	\$75.00
01/03/2022	JCS	Draft Documents	Continue to prepare and finalize Motions in Limine.	\$375.00	0.2	\$75.00
01/04/2022	JCS	Confer with co-counsel	Confer with co-counsel regarding pre-trial team meeting and pre-trial deadlines	\$375.00	0.2	\$75.00
01/04/2022	JCS	Review	Review request for writ filed by defendant; confer with team re: same	\$375.00	0.2	\$75.00
01/04/2022	JCS	Review and revise	Review and continue to prepare stipulations	\$375.00	0.2	\$75.00
01/06/2022	JCS	Confer with co-counsel	Confer with co-counsel regarding trial strategy and other pre-trial filings and to-do's	\$375.00	0.4	\$150.00
01/06/2022	JCS	Prepare for court hearing	Prepare trial binder	\$375.00	0.4	\$150.00
01/06/2022	JCS	Confer with co-counsel	Correspondences with co-counsel re: records in case that just came to light.	\$375.00	0.3	\$112.50
01/10/2022	JCS	Draft Documents	Review Defendant's Motions in Limine; Begin to draft response to Defendant's Motions in Limine; Correspondences with all counsel re: same; Continue to prepare witness list and trial brief.	\$375.00	0.4	\$150.00
01/11/2022	JCS	Draft Documents	Continue to prepare exhibit list, Rule 415 Notice and preliminary Voir Dire questions.	\$375.00	0.4	\$150.00
01/12/2022	JCS	Confer with co-counsel	Confer with co-counsel re: trial exhibits and trial to-dos; Continue to prepare for trial.	\$375.00	0.3	\$112.50
01/13/2022	JCS	Draft Documents	Confer with team; Continue to prepare witness list for trial.	\$375.00	0.3	\$112.50
01/13/2022	JCS	Review	Receive and review Defendant's witness list, exhibit list, and jury questions.	\$375.00	0.2	\$75.00
01/14/2022	JCS	Confer with co-counsel	Confer with team re: Defendant's witness list and our response to same.	\$375.00	0.2	\$75.00

01/14/2022	JCS	Draft Documents	Continue to prepare Response to Defendant's Motions in Limine	\$375.00	0.2	\$75.00
01/17/2022	JCS	Draft Documents	Continue to prepare: Plaintiffs' Response to Defendant's Motions in Limines; Plaintiffs' Motion to Strike Defendant's Experts and Exhibit List; Plaintiff's Jury Instructions; and Stipulations in preparation for consolidated trial.	\$375.00	0.5	\$187.50
01/17/2022	JCS	Research	Research issues in Defendant's Motion in Limine to prepare response to same.	\$375.00	0.2	\$75.00
01/18/2022	JCS	Draft Documents	Continue to prepare and finalize Plaintiffs' Response to Defendant's Motions in Limine	\$375.00	0.2	\$75.00
01/19/2022	JCS	Confer with co-counsel	Meeting with co-counsel re: pretrial and trial	\$375.00	0.5	\$187.50
01/19/2022	JCS	Review	Begin to review cases cited throughout Motions in Limine to prepare for pretrial	\$375.00	0.3	\$112.50
01/20/2022	JCS	Prepare for court hearing	Prepare for pretrial, specifically arguments on Plaintiffs' and Defendant's Motions in Limine	\$375.00	1.0	\$375.00
01/21/2022	JCS	Attend court hearing	Attend pretrial in Kansas City; Travel to/from.	\$375.00	4.0	\$1,500.00
01/21/2022	JCS	Review	Receive and review Court's docket entries and Orders following pretrial.	\$375.00	0.1	\$37.50
01/24/2022	JCS	Review	Receive and review Court Order re: Plaintiffs' Motion to Exclude Testimony of Maya Gasa.	\$375.00	0.1	\$37.50
01/24/2022	JCS	Correspondence	Receive and review correspondence from Court re: trial being continued; initial correspondences with the court, opposing counsel and team re: new trial setting	\$375.00	0.2	\$75.00
01/26/2022	JCS	Correspondence	Ongoing correspondences with court, opposing counsel and team re: new trial setting	\$375.00	0.2	\$75.00
01/27/2022	JCS	Review	Receive and review new consolidated trial setting; notify clients, experts and current and prior team re: same.	\$375.00	0.3	\$112.50
03/21/2022	JCS	Correspondence	Correspondence with T. Dean re: pre-trial meeting, plans for consolidated trial, etc.	\$375.00	0.2	\$75.00
03/24/2022	JCS	Correspondence	Correspondences with prison to set up pre-trial (consolidated cases) meeting w/ Dean	\$375.00	0.1	\$37.50
03/28/2022	JC	Draft/Revise	Prepare letter to Ms. Wright requesting in-person trial preparation meeting with J. Snow and Teri Dean.	\$150.00	0.1	\$15.00
03/28/2022	JC	Draft filings	Begin preparation of Plaintiffs' Request for Writ of Habeas Corpus Ad Testificandum related to Teri Dean.	\$150.00	0.1	\$15.00
03/28/2022	JCS	Correspondence	Correspondence with prison to schedule pre-trial meeting with T. Dean.	\$375.00	0.2	\$75.00
04/05/2022	JCS	Review and confer	Prepare and file writ for Dean; Correspondence with team re: outlines, topics, pre-trial meeting plans	\$375.00	0.3	\$112.50
04/06/2022	JCS	Conference	Attend pre-trial meeting with team; Confer with clerk and courtroom deputy to get details on voir dire seating chart, jury seating/rules, lunches, etc.; Correspondences with defense counsel re: exhibits for trial and access to same and rulings on motions in limine.	\$375.00	1.0	\$375.00

04/08/2022	JCS	Review	Review demonstrative chart circulated by J. Ammann and compare to Dean's housing assignments to illustrate when Bearden and Dean would have been in the same place at the same time; Correspondences with team re: demonstrative.	\$375.00	0.2	\$75.00
04/11/2022	JCS	Review	Review exhibits/link from defense counsel; review defense counsel's notes on MILs; prepare voir dire map; compile documents for voir dire; Ongoing correspondences with team re: pre-trial strategy, to-do's, etc.	\$375.00	0.4	\$150.00
04/11/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 1-7 to be used at trial.	\$150.00	0.1	\$15.00
04/12/2022	JCS	Review	Review EOA filed by Abbie Rothermich	\$375.00	0.1	\$37.50
04/13/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 8-10 and 22-23 to be used at trial.	\$150.00	0.1	\$15.00
04/14/2022	JC	Draft filings	Continue preparation of Plaintiffs' Exhibits 24-33 to be used at trial.	\$150.00	0.1	\$15.00
04/15/2022	JCS	Correspondence	Correspondence with T. Dean re: pre-trial meeting and trial appearance and what to expect; Continued correspondence with Vandalia re: April 22nd visit with T. Dean to adjust time for same; Correspondence with team re: trial strategy issues.	\$375.00	0.5	\$187.50
04/15/2022	JCS	Review	Review defendants exhibits and discuss job charts with co-counsel J. Ammann.	\$375.00	0.3	\$112.50
04/19/2022	JCS	Correspondence	Correspondences with team re: ongoing trial prep and strategy.	\$375.00	0.2	\$75.00
04/19/2022	JCS	Review	Research and review Defense witness, D. Clay, for purposes of preparing her cross-examination	\$375.00	0.1	\$37.50
04/20/2022	JCS	Draft Documents	Prepare summary of Dean's case for use in opening; Begin to prepare direct examination of Dean for use at trial; Correspondences with team re: same; Continue to prepare and discuss demonstratives	\$375.00	1.5	\$562.50
04/21/2022	JCS	Conference	Pre-trial team meeting to discuss trial and further develop themes and strategy	\$375.00	0.5	\$187.50
04/22/2022	JCS	Meet with Client	Travel to/from Vandalia to meet with T. Dean to prep her for trial	\$375.00	2.0	\$750.00
04/23/2022	JCS	Transportation	Travel to Kansas City for trial.	\$375.00	1.0	\$375.00
04/24/2022	JCS	Confer with co-counsel	Ongoing discussions with co-counsel re: case strategy.	\$375.00	0.3	\$112.50
04/25/2022	JCS	Attend court hearing	Attend and partake in day one of trial, including voir dire, openings and start of plaintiffs' case in chief; Prepare for day two of trial.	\$375.00	3.4	\$1,275.00
04/26/2022	JCS	Attend court hearing	Attend and partake in day two of trial; Prepare expert for day three of trial.	\$375.00	3.5	\$1,312.50
04/27/2022	JCS	Attend court hearing	Attend and partake in day three of trial.	\$375.00	2.5	\$937.50
04/28/2022	JCS	Attend court hearing	Attend and partake in day four of trial.	\$375.00	2.0	\$750.00
04/29/2022	JCS	Attend court hearing	Return travel from trial back to St. Louis.	\$375.00	1.0	\$375.00
05/07/2022	JCS	Correspondence	Correspondences with my prior firm, Kamykowski Gavin and Smith, to obtain time and expense reports to include in Plaintiffs' Motion for Fees.	\$375.00	0.4	\$150.00

05/08/2022	JCS	Draft Documents	Continue to prepare Plaintiffs' Motion for Attorney Fees; Discuss declarations, other exhibits, etc., to attach to same.	\$375.00	0.3	\$112.50
05/09/2022	JCS	Draft Documents	Continue to prepare Motion for Attorney Fees; Correspondences with team re: same.	\$375.00	0.2	\$75.00
05/09/2022	JCS	Research	Research reasonable attorney rates to apply to hours in order to continue to prepare Motion for Attorney Fees; Correspondences with team re: same.	\$375.00	0.3	\$112.50
05/10/2022	JCS	Draft Documents	Continue to prepare declaration; Continue to prepare Motion for Attorney's Fees.	\$375.00	1.0	\$375.00
05/10/2022	JC	Draft filings	Prepare Declaration of Jenifer C. Snow to be filed with Plaintiffs' Motion for Attorneys' Fees; Continue preparation of exhibits to be filed with Plaintiffs' Motion for Attorneys' Fees.	\$150.00	1.5	\$225.00
Non-billable Time Entries:						
03/16/2021	JCS	Deposition	Appear for and attend deposition of Vevia Sturm	\$375.00	0.6	\$225.00
04/07/2021	JCS	Correspondence	Attend Defendant Bearden's Deposition.	\$375.00	0.4	\$150.00

Totals: **52.4 \$18,825.00**

Expenses

Date	EE	Activity	Description	Cost	Quantity	Line Total
04/22/2022	JC	Mileage	Travel to/from Vandalia, MO for trial preparation with inmate Teri Dean.	\$27.70	1.0	\$27.70
05/04/2022	JC	Reimbursable Expense	Jenifer hotel for trial 4.23.22 - 4.30.22 (split 4 ways).	\$305.64	1.0	\$305.64
05/04/2022	JC	Reimbursable Expense	Trial Expenses – Travel for trial (split 4 ways).	\$21.05	1.0	\$21.05

Expense Total: **\$354.39**

Notes:

JC Total: 2.0 hours; \$300.00
JCS Total: 50.4 hours; \$18,525.00

Time Entry Sub-Total:	\$18,825.00
Expense Sub-Total:	\$354.39
Sub-Total:	\$19,179.39
Total:	\$19,179.39
Amount Paid:	\$0.00
Balance Due:	\$19,179.39

JENIFER C. SNOW'S EXPENSES

Date	Description	Category	Amount
April 22, 2022	Travel to/from Vandalia, MO for trial preparation with inmate and me-too witness, Teri Dean.	Mileage 189.4 miles x .585 IRS rate	\$110.80
April 23, 2022	Travel to KC, by train for trial, and by Uber from the train station to hotel. <i>receipts attached</i>	Travel	\$84.22
April 23, 2022 through April 29, 2022	Hotel for trial. <i>receipt attached</i>	Hotel	\$1,222.57
TOTAL			TOTAL EXPENSES \$1,417.59

Erica

From: etickets@amtrak.com
Sent: Tuesday, April 19, 2022 11:45 AM
To: Jenifer Snow
Subject: Amtrak: eTicket and Receipt for Your 04/23/2022 Trip - JENIFER SNOW
Attachments: Snow Jenifer 202204191244460511.pdf

SALES RECEIPT



Purchased: 04/19/2022 9:44 AM PTThank you for your purchase.

1. Retain this receipt for your records.
2. Print the attached eTicket and carry during your trip.

Merchant ID 006101 Massachusetts Ave NWWashington, DC 20001800-USA-
RAILAmtrak.com

Reservation Number - 12321AWashington, MO to
Kansas City, MO - Union Station (One-Way)APRIL 19, 2022
Billing Information

JENIFER SNOW1720 BLUEJAY CVSAINT LOUIS, MO 63144	
<hr/>	
Visa ending in 3216 (Purchase)Authorization Code 006484	Total \$60

Purchase Summary - Ticket Number 1090610592164

TRAIN 313: Washington, MO to Kansas City, MO - Union Station (One-Way) Depart 5:06 PM, Saturday, April 23, 2022 1 COACH SEAT	
	\$60.00
Ticket Terms & Conditions CANCELLATION FEE MAY APPLY.	
	Subtotal
	\$60.00
Total Charged by Amtrak	

\$60.00

Passengers

Jenifer Snow

Important Information

- Tickets are non-transferable.
- Changes to your itinerary may affect your fare. Refund and exchange restrictions and penalties for failure to cancel unwanted travel may apply. If your travel plans change, contact us before departure to change your reservation. If you do not board your train, your entire reservation from that point will be canceled. If you board a different train without notifying us, you will have to pay for it separately; the conductor cannot apply the money paid for your prior reservation. For more information please visit [Amtrak.com/changes](https://www.amtrak.com/changes).
- Summary of Terms and Conditions: Ticket valid for carriage or refund (subject to the refund rules of the fare purchased) for twelve months after day of issue unless otherwise specified. Amtrak tickets may only be sold or issued by Amtrak or an authorized travel agent/tour operator. Tickets sold or issued by an unauthorized third party will be voided by Amtrak. This ticket is a contract of carriage which includes specific terms and conditions and a binding arbitration agreement between Amtrak and the ticket holder. The terms and conditions and arbitration agreement are available at [Amtrak.com/terms-and-conditions.html](https://www.amtrak.com/terms-and-conditions.html). Tickets sold for non-Amtrak service are subject to the tariffs of the providing carrier.
- Questions? Contact us online at [Amtrak.com/contact](https://www.amtrak.com/contact) or call 1-800-USA-RAIL (1-800-872-7245) or for text telephone (TTY) 1-800-523-6590.

Mlle Jenifer Snow
MO

Room No. : 225
Arrival : 04.23.22
Departure : 04.29.22
Folio No. :
Conf. No. : 76213857
Cashier No. : 814
Page No. : 1 of 2

Company Name:

Group Name:

Date	Description	Charges	Payments
04.23.22	Room Charge	269.00	
04.23.22	Room Sales Tax	29.19	
04.23.22	Convention and Tourism Tax	20.18	
04.23.22	Kansas City Fee	1.50	
04.23.22	Room Sales Tax	0.16	
04.23.22	Convention and Tourism Tax	0.11	
04.24.22	Room Charge	149.00	
04.24.22	Room Sales Tax	16.17	
04.24.22	Convention and Tourism Tax	11.18	
04.24.22	Kansas City Fee	1.50	
04.24.22	Room Sales Tax	0.16	
04.24.22	Convention and Tourism Tax	0.11	
04.25.22	Room Charge	159.00	
04.25.22	Room Sales Tax	17.25	
04.25.22	Convention and Tourism Tax	11.93	
04.25.22	Kansas City Fee	1.50	
04.25.22	Room Sales Tax	0.16	
04.25.22	Convention and Tourism Tax	0.11	
04.26.22	Room Charge	149.00	
04.26.22	Room Sales Tax	16.17	
04.26.22	Convention and Tourism Tax	11.18	
04.26.22	Kansas City Fee	1.50	
04.26.22	Room Sales Tax	0.16	
04.26.22	Convention and Tourism Tax	0.11	
04.27.22	Room Charge	149.00	
04.27.22	Room Sales Tax	16.17	
04.27.22	Convention and Tourism Tax	11.18	
04.27.22	Kansas City Fee	1.50	
04.27.22	Room Sales Tax	0.16	
04.27.22	Convention and Tourism Tax	0.11	
04.28.22	Room Charge	149.00	
04.28.22	Room Sales Tax	16.17	
04.28.22	Convention and Tourism Tax	11.18	
04.28.22	Kansas City Fee	1.50	
04.28.22	Room Sales Tax	0.16	
04.28.22	Convention and Tourism Tax	0.11	
04.29.22	Visa		1,222.57
	XXXXXXXXXXXX0860 XX/XX		

Total 1,222.57 1,222.57

Mlle Jenifer Snow
MO

Company Name:
Group Name:

Room No. : 225
Arrival : 04.23.22
Departure : 04.29.22
Folio No. :
Conf. No. : 76213857
Cashier No. : 814
Page No. : 2 of 2

Balance	0.00
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Erica

From: Jenifer Snow <jenifercsnow@gmail.com>
Sent: Friday, April 29, 2022 9:10 AM
To: Jenifer Snow
Subject: Fwd: Your Saturday evening trip with Uber

----- Forwarded message -----

From: **Uber Receipts** <noreply@uber.com>
Date: Sun, Apr 24, 2022 at 9:54 AM
Subject: Your Saturday evening trip with Uber
To: <jenifercsnow@gmail.com>

Uber

Total \$24.22
April 23, 2022




Thanks for riding, Jenifer

We hope you enjoyed your ride
this evening.



Total	\$24.22
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Trip fare	\$21.52
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Subtotal	\$21.52
Wait Time 	\$0.29
Booking Fee 	\$1.86
Temporary Fuel Surcharge 	\$0.55

Payments



Visa ••••3216

4/24/22 9:54 AM

\$24.22

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